

**Guidance for the
Preparation of
Engineering Reports and Environmental
Information Documents for
Wastewater Treatment Plant Projects**

North Carolina Department of Environment and Natural Resources

Division of Water Infrastructure

Revised: May 2015

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Introduction

In 2010, the Construction Grants and Loans Section (the Section) of the Division of Water Quality developed a new funding system that instituted a priority rating system. As a direct result, the Section drafted a new set of guidelines for the development of engineering reports and environmental information documents (ERs/EIDs). It underwent a major revision in 2012.

In 2013, legislative action created the Division of Water Infrastructure (the Division) and consolidated the Clean Water State Revolving Fund (CWSRF) and the Drinking Water State Revolving Fund into the Division. It also funded the State Wastewater Reserve program (SWWR) and State Drinking Water Reserve program and moved a portion of the Community Development Block Grant program into the Division for use in funding infrastructure projects (CDBG-I).

As a direct result, the Division has undertaken a further revision of the ER/EID guidance to accommodate not only the CWSRF programs but also high unit cost grants under the SWWR and wastewater projects under the CDBG-I program. Additional ER/EID guidance for the drinking water programs in the Division will be developed later in 2015 for use with projects funded in the September 2015 funding round and beyond.

Also, the Division solicited input from a group of engineering consultants who have frequently used this guidance as well as Division staff to determine where improvements needed to be made. This latest revision of the guidance is a result of that work. Major changes included the following:

- Streamlining the information required to meet the purposes of the ER/EID.
- Tweaks to calculations and methodologies in some project types.
- Restructuring of the ER/EID guidance outline.
- Consolidation of similar type (e.g., collection systems, WWTPs) into one guidance document for each type for ease of use and updating.
- Hyperlinking the guidance for easy electronic navigation.
- Minor revisions to the environmental document.
- Editorial corrections.

As a way of addressing preferences to have one consolidated document or individual sections within the ER/EID, the Division developed a hybrid approach. In this approach, the guidance has been divided into three main project types: wastewater treatment plants, collection systems, and green projects. While most of the sections will be the same across all three documents, variations will occur related to sections of the ER/EID where specific requirements apply to specific project types.

Part of the document consolidation included restructuring the document and utilizing different nomenclature to distinguish between the ER/EID guidance and the ER/EID itself. References to places within the ER/EID *guidance* will be termed “chapter” and “subchapter” while references to the ER/EID *report* itself will be called “section” and “subsection.”

Additionally, this ER/EID guidance is separated into two major parts.

Part A provides general information associated with the funding and ER/EID review processes, when different requirements apply, and basic information associated with ER/EID structure, tables, figures, appendices, and workbooks. References to chapters within Part A will read as “See Subchapter 1.1.1 in Part A.” Please take the time to read this section.

Part B contains the meat of the ER/EID guidance and is structured in the same outline as the ER/EID would be prepared (e.g., Executive Summary, Current Situation, Future Situation, etc.). References to chapters within Part B will read as “See Subchapter 1.1.1 in Part B.”

This guidance also contains multiple boxes of different colors throughout the text. The yellow boxes highlight information the Division deems important for you to remember. The blue boxes provide some basic definitions of terminology used throughout the guidance. The purple boxes provide written examples of how some portions of the ER/EID might look. The green boxes provide equations. Last, the gray boxes found in [Part B](#) indicate where a major ER/EID would differ from a minor ER/EID.

Additionally, the Division will prepare a go-by ER/EID that users can access to have as an example when completing an ER/EID. Once it is complete, this will be found in as a separate document on [the Division’s website](#).

Last, for ease of access, the upfront information contains an [Abbreviated Table of Contents](#) with hyperlinks to this Table of Contents found at different places throughout the guidance. The point of this Abbreviated Table of Contents is to provide easy access to general sections of the guidance document. Also, the upfront information contains a [List of Updates](#). This list shows each subchapter within the guidance, when it was last updated, and the type of update (e.g., content added, content changes, editorial changes). The end of each subchapter also contains the month and year of the most recent update. Before beginning a project, check the List of Updates to ensure that what is used is the most current information.

Before beginning, please take a minute to review the [Table of Contents](#) to gain familiarity with the new guidance structure. For any questions, please contact Division staff. Their information is listed on [the Division’s website](#).

(Last updated: May 2015)

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1.0 General Information	May 2015	New content added
1.1 Programmatic Requirements	May 2015	New content added
1.1.1 Clean Water State Revolving Fund	May 2015	New content added
1.1.2 Drinking Water State Revolving Fund	May 2015	New content added
1.1.3 Community Development Block Grant for Infrastructure	May 2015	New content added
1.1.4 High Unit Cost Grants and State Revolving Loans	May 2015	New content added
1.1.5 State Emergency Loans	May 2015	New content added
1.1.6 Funding Hierarchy	May 2015	New content added
1.2 Level of Detail and Final Environmental Documents	May 2015	New content added
1.3 Funding Process	May 2015	New content added
1.3.1 Overview	May 2015	New content added
1.3.2 Engineering Report/Environmental Information Document Review Process	May 2015	New content added
1.3.2.1 Engineering Report/Environmental Information Document preparation and Submittal	May 2015	New content added
1.3.2.2 Initial Review of the Engineering Report/Environmental Information Document	May 2015	New content added
1.3.2.3 Submittal of Revised Engineering Report/Environmental Information Document	May 2015	New content added
1.3.2.4 Iterative Process	May 2015	New content added
1.3.2.5 Preparation of Finding of No Significant Impact/Environmental Assessment	May 2015	New content added
1.3.2.6 Project Approval	May 2015	New content added
1.3.2.7 Engineering Reports under the Community Development Block Grant Program for Infrastructure	May 2015	New content added
1.4 Additional Guidance (USDA Co-Funded Projects Only)	May 2015	New content added
2.0 Engineering Report/Environmental Information Document Basic Requirements	May 2015	Editorial changes
2.1 ER/EID Structure	May 2015	None
2.1.1 Basic Outline	May 2015	Content changes
2.1.2 Multiple Project Types	May 2015	Content changes
2.2 Tables	May 2015	Content changes
2.3 Figures	May 2015	Content changes
2.4 Appendices	May 2015	Content changes
2.5 Workbooks	May 2015	Content changes
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2.1.3	Specific Equipment Issues	May 2015	No changes
2.2	Wastewater Treatment Plant Expansion	May 2015	New content added
2.2.1	Collection System Condition	May 2015	New content added
2.2.2	WWTP Condition	May 2015	New content added
2.2.2.1	General WWTP Condition	May 2015	New content added
2.2.2.2	Condition of WWTP Equipment (Existing WWTPs)	May 2015	Content changes
2.2.2.3	Condition of WWTP Equipment	May 2015	Content changes
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2.2.4	Historical and Current Wastewater Flow	May 2015	Content changes
3.0	Future Situation	May 2015	Content added
3.1	Wastewater Treatment Plant Rehabilitation	May 2015	Content changed
3.2	Wastewater Treatment Plant Expansion	May 2015	Content changed
3.2.1	Population Projections	May 2015	Content changed
3.2.2	Flow Projections	May 2015	Content changed
3.3	Energy Efficiency	May 2015	New Content added
4.0	Need and Purpose	May 2015	Editorial changes
5.0	Alternatives Analysis	May 2015	Editorial changes
5.1	Alternatives Description	May 2015	New content added
5.1.1	No-Action Alternative	May 2015	New content added
5.1.2	Preferred Alternative	May 2015	New content added
5.1.3	Water Resources Reform and Development Act of 2014 Requirements	May 2015	New content added
5.1.3.1	Water Use, Reuse, Recapture, and Conservation	May 2015	New content added
5.1.3.2	Energy Conservation	May 2015	New content added
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5.1.4.2.4	Regionalization	May 2015	New content added

Section	Date Updated	Reason
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5.1.4.2.6 Biosolids Alternatives Description	May 2015	New content added
5.1.4.3 Energy Efficiency	May 2015	New content added
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5.2.3 Determination of Operations and Maintenance Costs	May 2015	Content changes
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Part A

Funding Process Information

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1.0 General Information

As part of its funding process, the Division of Water Infrastructure (the Division) requires that projects awarded funding as part of its programs submit an engineering report/environmental information document (ER/EID). The ER/EID is a document that serves three purposes:

- It fulfills programmatic requirements
- It enables a conceptual, planning review of the project for technical soundness
- It provides the documentation that serves as the basis for any for any environmental clearances.

Final environmental document – The legal document that is prepared in accordance with the State Environmental Policy Act or National Environmental Policy Act (CDBG-I program only).

The Division – The Division of Water Infrastructure

ER/EID – Engineering Report /Environmental Information Document

This section provides an overview of the different ER/EID requirements for each program, how to determine the type of final environmental document and ER/EID needed, and an overview of both the funding process and the ER/EID process.

Please read through this section carefully, as it provides information that will enable you to prepare an ER/EID appropriate for the funding related to your project.

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(Last Updated May 2015)

1.1 Programmatic Requirements

Currently, the Division offers funding through the following programs:

- Clean Water State Revolving Fund (CWSRF)
- Drinking Water State Revolving Fund (DWSRF)
- High Unit Cost (HUC) grants related to the State Wastewater Reserve (SWWR) and State Drinking Water Reserve (SDWR)¹
- Community Development Block Grant for Infrastructure (CDBG-I)
- State Revolving Loan for wastewater (WW-SRL)
- State Emergency Loan for wastewater (WW-SEL)²

CWSRF – Clean Water State Revolving Fund

DWSRF – Drinking Water State Revolving Fund

HUC – High Unit Cost

SWWR – State Wastewater Reserve

SDWR – State Drinking Water Reserve

CDBG-I – Community Development Block Grants for Infrastructure

WW-SRL – Wastewater State Revolving Loan

WW-SEL – Wastewater State Emergency Loan

¹ Currently, the Division offers technical assistance grants (TAGs) for both wastewater and drinking water. However, this guidance does not apply unless an ER/EID for future funding under one of the programs is the deliverable.

² Please note that presently, no funds are available for the Drinking Water State Revolving Loan (DW-SRL) and Drinking Water State Emergency Loan (DW-SEL). The Division hopes to offer funding through these programs in the future.

While the overall funding process generally works in the same manner, some differences may apply to what is required for the ER/EID. [Figure A.1.1](#) shows a flow diagram of how to determine the programmatic requirements related to the ER/EID. The following sections discuss the programmatic requirements for each funding type.

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1.1.1 Clean Water State Revolving Fund

The CWSRF is the most mature of the funding programs offered by the Division and functions under an operating agreement negotiated between the Division and the U.S. Environmental Protection Agency (EPA). As part of the operating agreement, the Division provides a general outline for ERs/EIDs, which is discussed in [Subchapter 2.1.1](#) of this part. The ER/EID for a CWSRF project should contain all parts of the outline discussed, including all parts of the EID portion.

In terms of final environmental document, the CWSRF requires either a categorical exclusion (CE) or a Finding of No Significant Impact (FONSI). The minor construction activities requirements determine whether a project will require a CE or FONSI. [Appendix A](#) contains a copy of these criteria, or they may be accessed access them at [15A NCAC 01C .0408](#). Please note that it is the Applicant's responsibility to determine the type of final environmental document the project will require. For questions, please contact the Division's Environmental Review Coordinator

In extremely rare cases, a project might require an environmental impact statement (EIS) to be prepared for a final environmental document of a Record of Decision (ROD). If at any point an Applicant thinks that the project needs an EIS/ROD, please contact the Division's Environmental Review Coordinator as soon as possible, as such a project cannot submit a funding application until a draft EIS has been sent to the State Clearinghouse (SCH).

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It is the Applicant's responsibility to determine the type of final environmental document your project will require. For questions regarding the final environmental document, please contact the Environmental Review Coordinator

Categorical Exclusion (CE) – The final environmental document for projects that do not exceed the state minor construction activities criteria or the HUD minor criteria (CDBG-I) only.

Finding of No Significant Impact (FONSI) – The final environmental document for projects that exceed the state minor construction activities requirements or the HUD minor criteria (CDBG-I) only.

Record of Decision (ROD) – The final environmental document prepared based upon the environmental impact statement. This is required in very rare circumstances.

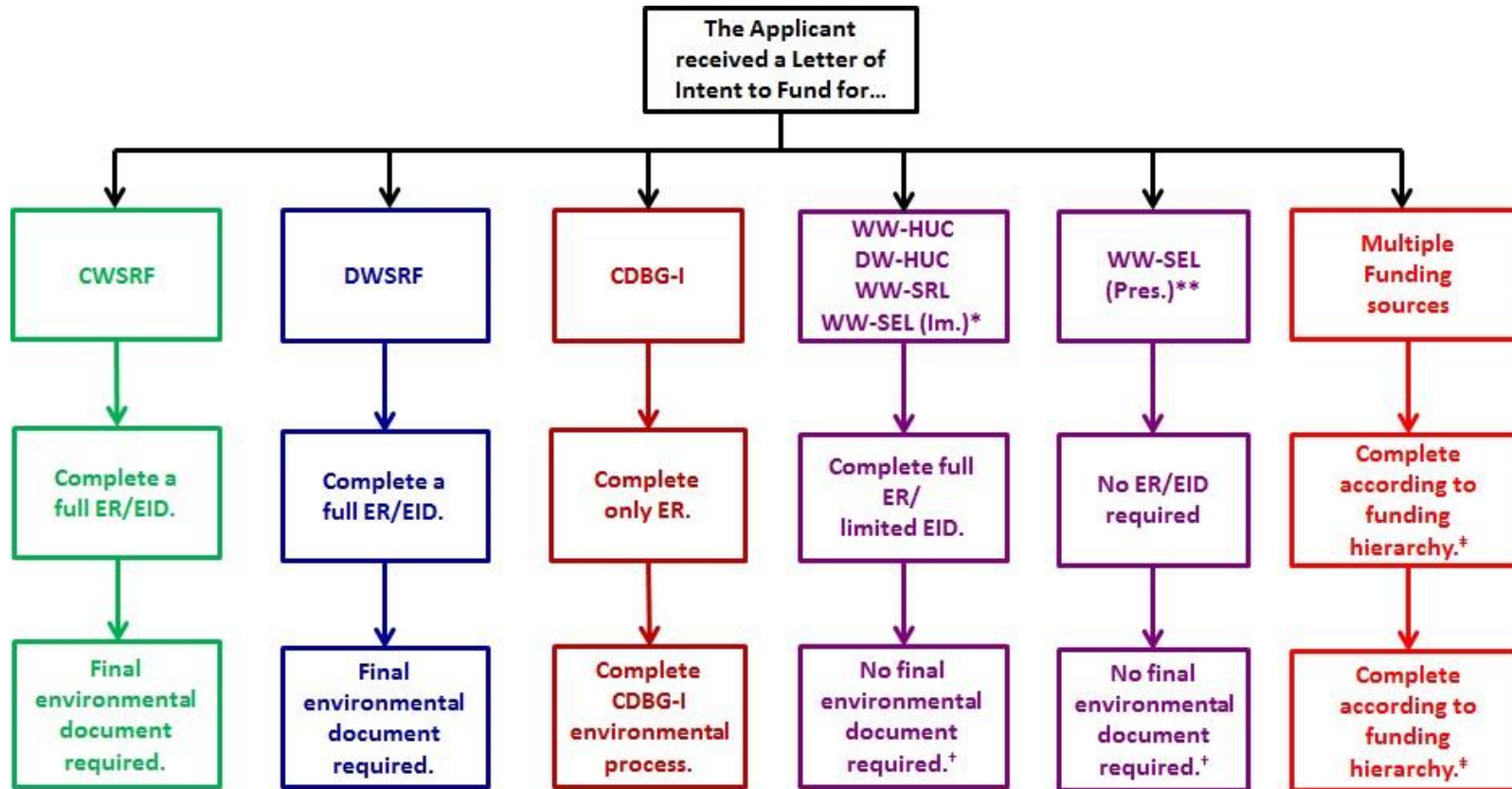
Environmental Review Coordinator – Division staff that manages the environmental review process.

EPA – U.S. Environmental Protection Agency

EIS – Environmental Impact Statement

SCH – North Carolina State Clearinghouse

Applicant – The legal entity seeking funding from the Division.



†No final environmental document will be required for projects that are under the minor construction activities requirements as discussed in Section 1.2.2 of this guidance.

‡Please see Section 1.1.6 for a discussion of the funding hierarchy.

*WW-SEL funding for emergencies that are imminent.

**WW-SEL funding for emergencies that are present.

(Last updated: May 2015)

Figure A.1.1. Flowchart of Type of ER/EID to Complete

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1.1.2 Drinking Water State Revolving Fund

The DWSRF program is a sister program to the CWSRF and operates under the same operating agreement with the EPA. Therefore, the ER/EID requirements are the same as for the CWSRF. Please see [Subchapter 1.1.1](#) of this part for more details on the requirements related to the ER/EID.

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1.1.3 Community Development Block Grant for Infrastructure

The CDBG-I program is a newcomer to the Division and operates under the auspices of the U.S. Department of Housing and Urban Development (HUD). Therefore, the programmatic requirements are different. For the CDBG-I program, the technical and environmental review occur under two different procedures. The ER process will occur as discussed under [Subchapter 1.3.2](#) of this part of the guidance.

Projects funded through the CDBG-I program follow a completely different environmental review procedure.

The environmental documentation process will follow a different set of environmental guidelines. This is because the environmental portion of the CDBG-I program is administered under the National Environmental Policy Act (NEPA) rather than the State Environmental Policy Act (SEPA), which is utilized for all of the Division's other funding programs.³ In short, the Responsible Entity is responsible for completing all required documentation for the EID and for preparing the final environmental document according to the HUD criteria.

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1.1.4 High Unit Cost Grants and State Revolving Loans

Projects that receive HUC grants and SRLs receive funds that fall under the purview of state rules and regulations. As a result, the requirements for an ER/EID are slightly different. For the ER portion, a full ER is required to ensure the technical soundness of the project. For the EID, only a limited set of tables are required. These tables relate to floodplains, threatened and endangered species for terrestrial and aquatic species, cultural resources, and wetlands and streams. Each of these resource categories relate to areas where permitting issues with federal agencies could arise. Submitting these tables for review by the Division's Environmental Review Coordinator ensures that the Applicant and the Division address any concerns related to these categories to keep the project moving on schedule.

Limited EID – An EID where only certain tables are required.

For state-funded projects, no final environmental document is required so long as the project remains below the minor construction activities threshold listed in [15A NCAC 01C .0408](#). If the project exceeds these criteria, then a FONSI will be required. Utilize the procedures in [Subchapter 1.2](#) of this part to determine the type of document the project will require.

³ For more information on the CDBG-I environmental clearance, please see the link on the [Division's website](#).

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(Last updated: May 2015)

1.1.5 State Emergency Loans

For the wastewater programs, situations may arise where an Applicant may need to consider a WW-SEL. State emergency loans are loans that are made to address emergency situations an Applicant may face. Due to the emergency nature, such loans will be funded outside of the State Water Infrastructure Authority (the Authority) process.

An Applicant may apply at any time during the year for a WW-SEL and must contact the Division as soon as they recognize a project to address an emergency.

Because such loans will be made outside the process, the criteria for emergency loans are very strict and related only to public health threats that are either present or imminent. If an Applicant thinks that their project is either present or imminent, then they should contact the Division for further direction.

Emergencies that are imminent will go through the ER/EID process as described in [Subchapter 1.3.2](#) of this part. Emergencies that are deemed as present require that the Applicant work closely with the Division to complete the funding process.

For projects where an emergency is present, there will be no environmental review. For projects where emergencies are considered imminent, the final environmental document will follow the same requirements as [Subchapter 1.1.4](#) in this part as discussed above.

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1.1.6 Funding Hierarchy

Occasions may arise where an Applicant may utilize two funding sources from within the Division. For example, an Applicant may co-fund a project with a CDBG-I grant and a CWSRF loan or with a CWSRF and SRL. If this occurs, then adhere to the documentation requirements related to the stricter federal program. For former example, with the previous project, follow the documentation requirements for the CDBG-I program as discussed in [Subchapter 1.1.3](#) of this part and prepare only the ER in accordance with this guidance because the environmental portion would follow the separate requirements for the CDBG-I program. For the latter example, follow the documentation requirements as discussed in [Subchapter 1.1.1](#) of this part and prepare both a full ER and a full EID in accordance with [Part B](#) of this guidance.

For projects co-funded among two programs within the Division, adhere to the documentation requirements related to the stricter federal program.

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1.2 Level of Detail and Final Environmental Documents

Before beginning the process of drafting the ER/EID, first determine the type of environmental document that will be issued at the end of the process. The final environmental document required also dictates the level of detail for the ER/EID. [Figure A.1.2](#) below shows the basic decision-making process to use when determining the type of final environmental document. Please note, as previously mentioned, that it is the Applicant’s responsibility to determine the type of final environmental document. For questions regarding the determination, please contact the Division’s Environmental Review Coordinator.

For projects funded through a WW-HUC grant, WW-SEL, or WW-SRL, the “Prepare CE” in Figure 1.2 would be no final environmental document required.

Projects funded through the CDBG-I program will always require a minor ER.

Note: For projects that are funded only through the CDBG-I program or are jointly funded with the CDBG-I program, the minor ER format will always be used. Additionally, CDBG-I environmental documentation preparation falls under a [completely different process](#).

If the project will require a CE, then use the minor ER/EID format. This format is mainly tabular in nature. It also contains workbooks prepared by the Division that may be used for some

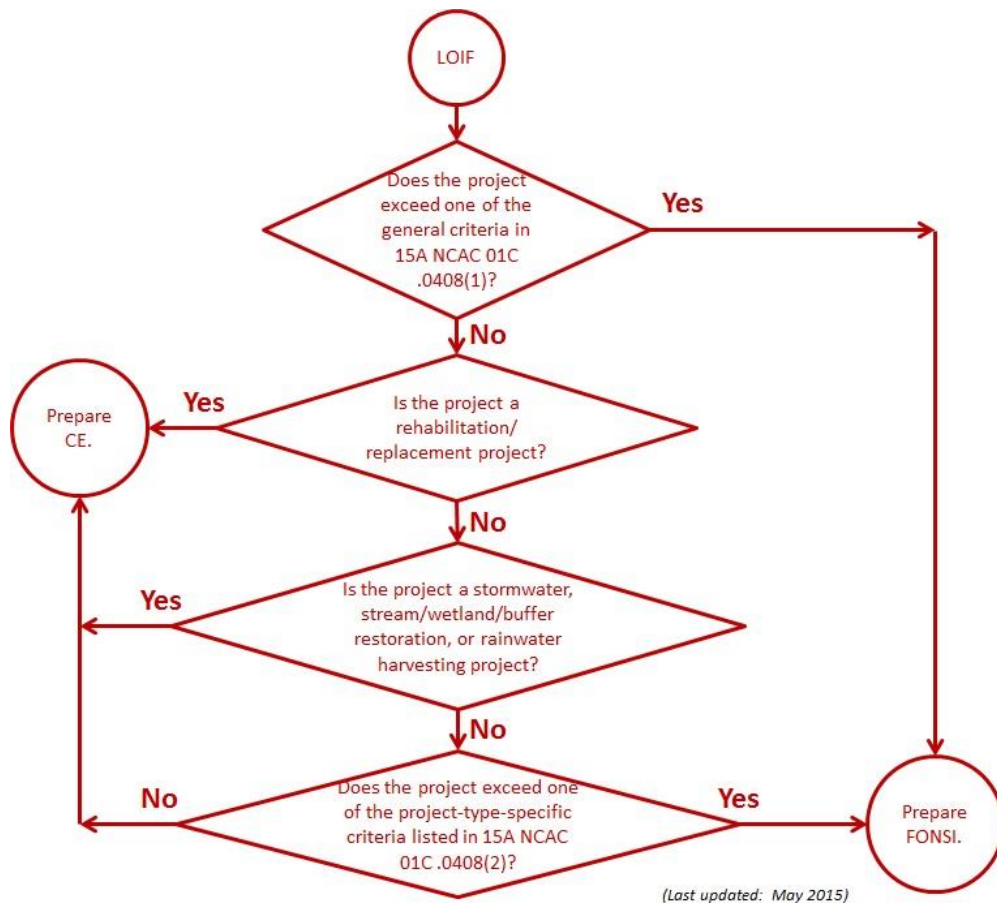


Figure A.1.2. Process Diagram for Determination of Final Environmental Document

calculations. If preparing an ER/EID under this format, the workbooks and methodologies provided within this guidance must be used. Workbooks are available on the [Division's website](#). Exceptions may be made only as noted within the guidance.

Project Manager – The Division's engineer responsible for managing the funding process from receipt of the ER/EID through construction. The Project Manager is the primary point of contact for questions.

If a project requires a FONSI or EIS, then it will require a major ER/EID. Prepare the ER/EID in the more narrative format of a report. Tables may be used to provide information succinctly. Additionally, the workbooks provided on the website may be used. Alternative methodologies for all calculations may be used. However, if using alternative methodologies, discuss the methodology used for the calculations and provide a sample so that the Project Manager assigned to the project can replicate the work.

For a minor ER/EID, the tables and workbooks provided by the Division must be used.

For a major ER/EID, alternative methodologies may be used.

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1.3 Funding Process

Since 2010, the Division has initiated a schedule to ensure that Applicants utilize program funds in an expeditious manner. The following subchapters discuss the funding process in general and then the ER/EID review process in specific.

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(Last updated: May 2015)

1.3.1 Overview

For all programs except the CDBG-I program, the funding process is a 24-month process that begins when the State Water Infrastructure Authority (the Authority) awards funding to an Applicant (see [Figure A.1.3](#)). The Division then sends a Letter of Intent to Fund to the Applicant. This letter contains a series of instructions as well as a list of milestones that need to be met. These milestones must be met by both the Applicant and the Division, or funding may be pulled and shifted into the following funding round. The ER/EID process occurs at the beginning of the funding process. The overall timeline of the funding process follows the SRF program timelines as set forth in the Intended Use Plan. The Division's website has the latest [Intended Use Plan](#) available for viewing.

For the CDBG-I program, the overall funding process is somewhat similar. The differences vary in the timelines. Additionally, the environmental documentation process occurs under a completely separate process that is discussed in detail during mandatory training as well as in [specific guidance](#) available on the Division's website.

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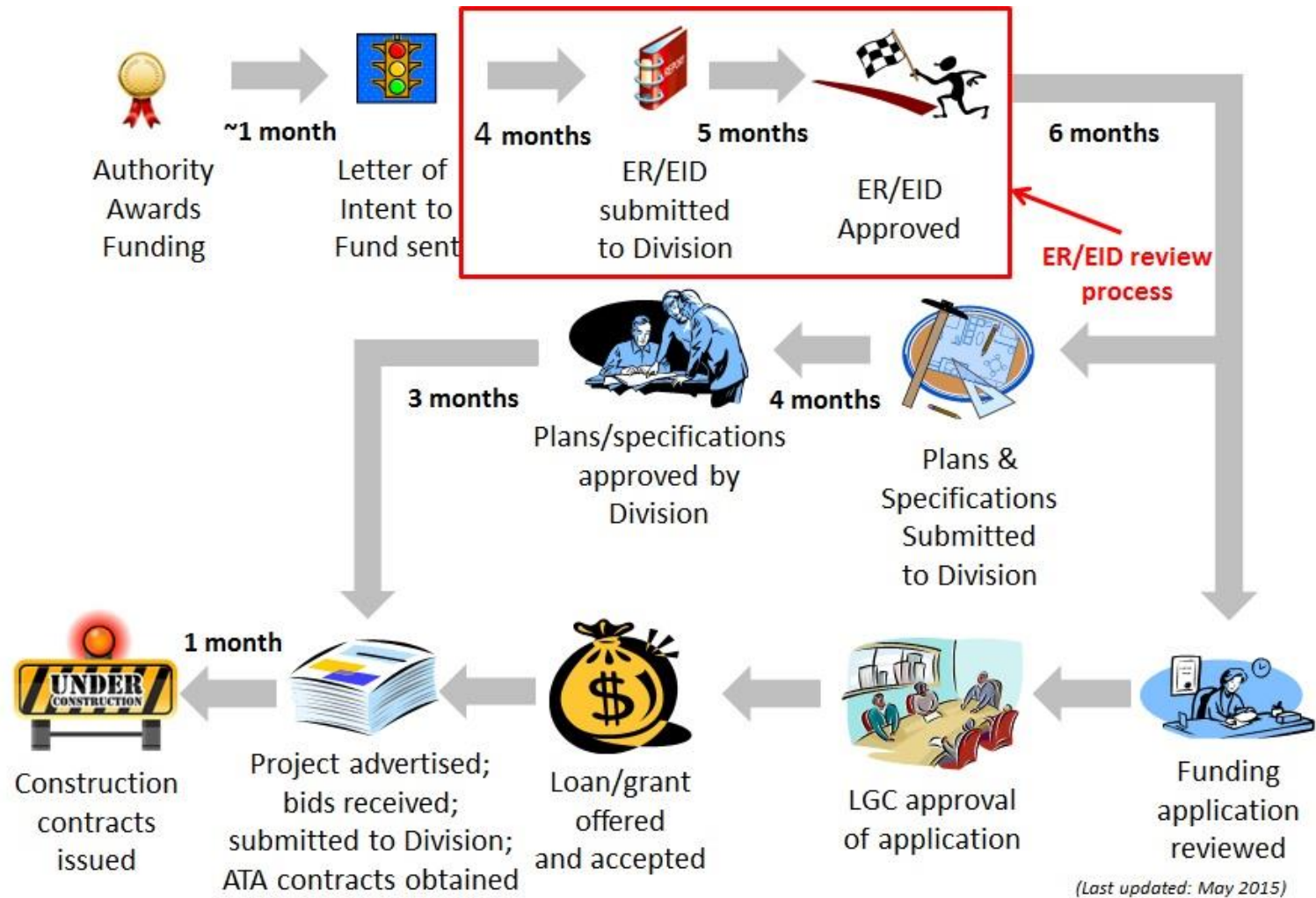


Figure A.1.3. Funding Process Overview

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1.3.2 Engineering Report/Environmental Information Document Review Process

As discussed in [Subchapter 1.3.1](#) of this part, the review of the ER/EID occurs early in the planning process. It is a nine-month process that requires that milestones be met both by the Applicant and Division staff.

The Applicant is responsible for ensuring that the initial submittal deadline is met by preparing an ER/EID that adheres to the requirements in [Chapter 2](#) in [Part A](#) and the appropriate subchapters in [Part B](#). Additionally, when Division staff send comments, the Applicant will be responsible for revising and resubmitting the ER/EID in a timely manner. Last, the Applicant will be responsible for responding to any additional comments so that the Division may approve the ER/EID by the date listed in the milestone letter.

Division staff must review the ER/EID in a timely manner and provide a thorough, clear set of comments. The Division is also responsible for working with the Applicant to resolve all technical and environmental issues. Additionally, if a FONSI is needed, the Division’s Environmental Review Coordinator will coordinate as needed with any agencies that may have comments. The Environmental Review Coordinator will also prepare any required final environmental documentation.⁴ Last, Division staff is responsible for drafting and transmitting the ER/EID approval letter so that the project may move into the bid and design phase of the funding process.

[Figure A.1.4](#) shows an overview of ER/EID review process. The following sections discuss each step of the funding process in greater detail.

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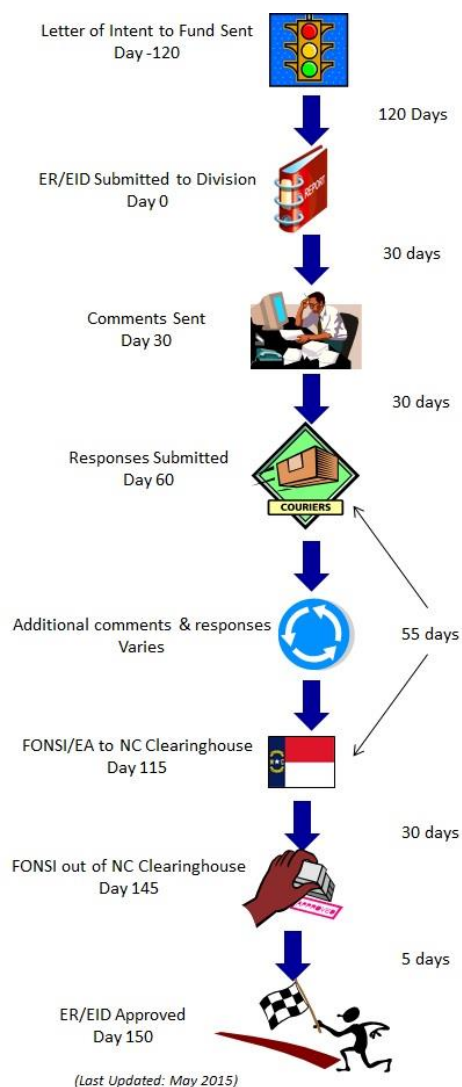


Figure A.1.4. Overview of ER/EID Review Timeline

⁴ Note that for the CDBG-I program, [all environmental reviews](#), including preparation of the final environmental document, are completed by the Responsible Entity. Instead, the Division has oversight responsibilities.

1.3.2.1 Engineering Report/Environmental Information Document Preparation and Submittal

Before beginning to prepare the ER/EID, the Applicant must determine what must be in the ER/EID in terms of tables as well as the level of detail required. Utilize the information found in [Subchapter 1.1](#) of this part as well as [Figure A.1.1](#).

When preparing the ER/EID, follow the outline shown in [Subchapter 2.1.1](#) in of this part using the appropriate format (minor vs. major).

Once the Applicant has completed preparing the ER/EID, complete the Submittal Checklist found in [Appendix B](#). A PDF and Word copy for use is also available on the [Division’s website](#). The Submittal Checklist provides information to the Division regarding information that the Division tracks for reporting purposes to the EPA and the North Carolina General Assembly (NCGA). It also provides contact information and a way for the Applicant to ensure that all portions of the ER/EID have been completed. If the Applicant fails to submit the Checklist for Initial Submittal, the Project Manager will contact the appropriate person and ask for a copy. The Division will not begin the review until the Project Manager receives this checklist.

The ER/EID must arrive at the Division’s offices by the milestone on the Letter of Intent to Fund. However, you may submit the ER/EID ahead of the milestone date listed in the Letter of Intent to Fund. This will help to accelerate the funding process.

The ER/EID must be sealed, signed, and dated by a Professional Engineer. Otherwise, the Project Manager will not begin review.

Submittal package – The documentation submitted by the Applicant to the Division that contains the Checklist for Initial Submittal and copies of the ER/EID.

NCGA – North Carolina General Assembly

Letter of Intent to Fund (LOIF) – A letter sent by the Division once the Authority has made funding awards. The letter serves as the official notice that Applicants can begin their environmental documentation preparation.

Submit the ER/EID to the Division by the submittal deadline listed in the Letter of Intent to Fund (LOIF). The number of copies depends on the final environmental document as shown in [Table A.1.1](#) below. In terms of meeting milestones, the initial ER/EID may be submitted ahead of schedule. Doing this will further accelerate the funding process.

Funding Program	Final Environmental Document²	
	CE	FONSI
CWSRF	2 copies	19 copies
DWSRF	2 copies	19 copies
CDBG-I	2 copies	2 copies
HUC	2 copies	19 copies
SRL	2 copies	19 copies
SEL	2 copies	19 copies
Hybrid Funding	2 copies ³	19 copies

¹The Division has the discretion to ask for more copies if needed.
²For an EIS/ROD, please contact the Environmental Review Coordinator for the appropriate number of the ER/EIS to submit.
³For hybrid funding involving the CDBG-I program, only the ER will be submitted.

Note: The ER/EID must have a Professional Engineer's seal, date, and signature on the cover of the document. Otherwise, the Division will not begin review of the ER/EID.

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1.3.2.2 Initial Review of the Engineering Report/Environmental Information Document

Once the Division receives the ER/EID, the Project Manager and Environmental Review Coordinator will review it for adherence to the guidance found in [Part B](#). They will generate a set of review comments. Additionally, if a FONSI is required, the Environmental Review Coordinator will send copies to SEPA Coordinator for the North Carolina Department of Environment and Natural Resources (DENR), the appropriate U.S. Army Corps of Engineers (USACE) field office, the appropriate U.S. Fish and Wildlife Service (FWS) field office, and the Department of Cultural Resources, the North Carolina Emergency Management Agency (NCEMA).

Comment package – Documentation sent by the Division to the Applicant that contains technical, environmental, and agency comments as well as a cover letter.

DENR – North Carolina Department of Environment and Natural Resources

USACE – U.S. Army Corps of Engineers

FWS – U.S. Fish and Wildlife Service

NCEMA – North Carolina Emergency Management Agency

These comments will be combined into a package that consists of

- Technical comments
- Environmental comments
- Agency comments (for projects requiring a FONSI or ROD)
- A comment cover letter

The comment cover letter will list the date by which the Applicant's responses to comments and a revised ER/EID are due back to the Division as well as the number of copies the Applicant needs to submit.

Please note that during this period, the Applicant and its consultant most likely will not be contacted by Division staff. This is because during this 30-day review period, Project Managers and the Environmental Review Coordinator are reviewing several ERs/EIDs simultaneously, potentially from different programs. The project manager will send all comments by the end of the 30-day window.

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1.3.2.3 Submittal of Revised Engineering Report/Environmental Information Document

Once the Project Manager has sent the Applicant and its consultant the comment package containing the initial comments, The Applicant will need to prepare a revised ER/EID that

reflects the responses to those comments. The resubmittal package must contain the following items:

- Revised ERs/EIDs
- Response-to-Comment Document

The revised ER/EID should incorporate all changes made in the ER/EID. How changes are shown is up to the Applicant and may be in the form of Track Changes, different color text, or other methods. Unless otherwise denoted by the comment package transmittal letter, submit two complete copies.

Do not send a partial submittal where only the pages that have changed are included. Partial submittals raise the risk of incomplete reports due to pagination and formatting issues. Additionally, Division staff will not be responsible for incorporating the changed pages into the ER/EID. If such a submittal is received, the Project Manager will contact the Applicant and ask for submittal of the entire ER/EID.

When preparing the ER/EID for resubmittal, all appendices save for those that change may be placed on a CD or DVD.

Another critical document for the resubmittal package is the response-to-comment document. Prepare this document so that each comment has a response. Responses should be detailed and references changes made to the ER/EID (e.g., “Changes have been made to Section 5.1 to reflect this response.” This will enable Division staff review the revised ER/EID in an efficient manner.

For projects requiring a FONSI, the response-to-comment document and changes to the ER/EID should also reflect any comments from the environmental agencies. For any questions about how to respond to these comments, please contact the agency directly and update the Division’s Environmental Review Coordinator, as they will be able to help the Applicant work with the appropriate agency(ies).

Send the resubmittal package to the Division within 30 days. The typical number of copies required is two copies. However, if the project is a FONSI, additional agencies may require revised copies. If that is the case, then the comment package transmittal letter will note the number of copies required.

Sometimes, issues may arise that prevent meeting this deadline. Such issues may include personal matters, the need for more fieldwork, or the collection of more data. If this occurs, contact the Project Manager as soon as the need for the delay arises. While such a delay may not jeopardize funding, it does increase the potential not to meet the milestone of ER/EID approval. This may become an issue if a FONSI is required as the final environmental document.

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Partial resubmittals of the first revision of the ER/EID will not be accepted. If a partial submittal occurs, the Project Manager will contact the Applicant and ask for full resubmittals.

Resubmittal package – The documentation sent by the Applicant to the Division that consists of the Checklist for Revised Reports, revised ERs/EIDs, and a response-to-comment document.

Response-to-Comment document – The document that details how the Applicant addresses each comment generated by the Division.

Unless otherwise denoted in the comment package, submit two *complete* copies of the revised ER/EID.

For questions related to the number of copies required, please contact the Project Manager.

(Last updated: May 2015)

1.3.2.4 Iterative Process

Once the Project Manager receives the revised ER/EID and response-to-comment document, they will review it and may issue either minor comments or major comments. Additionally, for projects requiring a FONSI, copies of the ER/EID will be distributed to any agencies that had comments.

Minor comments consist of small items like adjusting a figure or changing a number. These comments may be dealt with via phone and/or e-mail. To respond to these minor comments, submit electronic copies of the page(s) that change. With the exception of the EID, those pages must have the PE seal, signature, and date. Most comments during this portion of the review process will be minor.

Sometimes, major comments may arise. These usually occur for the following reasons:

- The responses generate more questions that will impact the approval of the project.
- The response-to-comment document did not provide enough detail.
- The response-to-comment document did not address all comments.
- Agency comments were not appropriately addressed (FONSIs only).

If this occurs, the Project Manager and Environmental Review Coordinator will draft additional sets of comments, and any review agencies will send additional correspondence. These will be compiled in a formal comment package and sent to the Applicant and its consultant. To respond, submit a formal resubmittal package as described in [Subchapter 1.3.2.3](#) of this part.

If the project requires a CE as a final environmental document, then will skip to [Subchapter 1.3.2.6](#) of this part. If the project requires a FONSI, then you will proceed to the next section.

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1.3.2.5 Preparation of Finding of No Significant Impact/Environmental Assessment

For projects requiring a FONSI, an additional step must occur. First, once all technical and environmental issues are resolved, the Environmental Review Coordinator will contact the Applicant and ask that the public meeting be held. Please see [Subchapter 9.2.2 of Part B](#) for more information on what is required related to the public meeting.

Minor comments – Comments by the Division during the iterative portion of the review process that may be dealt with by the submittal of individual pages in PDF format via e-mail.

Major comments – Comments made by the Division during the iterative process that require a full resubmittal of the ER/EID.

Formal comment package – The set of any technical, environmental, and/or agency comments that requires a full resubmittal of the ER/EID and a comment/response document.

Minor comments do not require a full resubmittal of comments while major comments do.

FONSI/EA – Finding of No Significant Impact/Environmental Assessment

SCH – North Carolina State Clearinghouse

Once the Applicant has submitted all documentation associated with the public meeting, the Environmental Review Coordinator will prepare a Finding of No Significant Impact/Environmental Assessment (FONSI/EA). Once the Division Director has signed the FONSI/EA, it will go to the SCH for a 30-day public review where all agencies plus the public will have the opportunity to comment. The Division will also post the FONSI/EA [on the website](#). Once this period passes, the SCH will send a memo to the Division that falls into one of three categories:

- No comment.
- Comments to be noted.
- Comments requiring changes in the document

If the SCH memo says, “No comment,” then the project can be approved.

State Clearinghouse memos with comments to be noted usually contain information that can be incorporated into the project during the plan and bid documentation approval step of the funding process. The Project Manager will ensure that these documents contain these measures.

State Clearinghouse memos with substantive comments will require additional changes to the ER/EID. If that is the case, then you will need to revise the ER/EID, and the Environmental Review Coordinator will modify the FONSI/EA to incorporate those changes. The FONSI/EA will be resubmitted to the SCH, and additional review time must be allowed.⁵

Once any issues with the FONSI/EA have been resolved, the Division will approve the project.

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(Last updated: May 2015)

1.3.2.6 Project Approval

If a CE is the final environmental document, then the Project Manager and Environmental Review Coordinator will determine that all environmental and technical issues are resolved. Then they will ask for one final hard copy that incorporates all changes to the ER/EID and one electronic copy. They retain the hard copy in the project files until the project closes out (e.g., construction is finished) and will retain the electronic copy in the files that get archived.

For projects funded through the HUC, WW-SRL, or WW-SEL programs *only* that are below the minor construction activity criteria, the Environmental Review Coordinator will not prepare a final environmental document.

The Environmental Review Coordinator will draft the CE while the Project Manager drafts the approval letter.⁶ Both will be signed by the SRF Section Chief or CDBG-I Unit Supervisor (for CDBG-I projects only). Then, the Project Manager will send both a hard copy and e-copy of the approval letter and CE (if required).

⁵ Additional review time may not have to be the entire 30 days. Review periods will be determined by the SCH on a case-by-case basis.

⁶ For projects funded *only* with state funds (WW-HUC, WW-SRL, WW-SEL) that are below the minor construction activity requirements, only an approval letter will be prepared, as no final environmental document will be required.

If the project requires a FONSI, then Division will have already sent a copy of the FONSI/EA. The Project Manager will ask for one final hard copy and e-copy of the ER/EID. They will prepare the approval letter. Once the appropriate person has signed, then they will send both a hard copy and e-copy to the applicant.

Once the Applicant has received the e-copy, the ER/EID review process is complete, and the Applicant may proceed to the next stage of the funding process.

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(Last updated: May 2015)

1.3.2.7 Engineering Reports under the Community Development Block Grant for Infrastructure Program

For ERs that are prepared under the CDBG-I program, remember that only the ER portion of the outline in [Part B](#) will need to be completed. Additionally, timelines may vary slightly from other funding programs as this program matures. Please pay special attention to the milestones within the LOIF as well as timelines discussed during training. Once the timelines have been solidified, this guidance will be updated to reflect that.

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(Last updated: May 2015)

1.4 Additional Guidance (USDA Co-Funded Projects Only)

In some situations, projects funded by the Division may be co-funded by the United States Department of Agriculture (USDA). Because of the USDA's funding requirements, their ER guidelines have additional requirements. For these co-funded projects, ensure that the additional requirements found in the [USDA guidance](#) are also provided in the ER/EID. Doing so will allow for both agencies to complete their reviews in an efficient manner. For the additional sections required by the USDA guidance, make it clear that the information is provided for USDA funding purposes only.

For projects co-funded with USDA funds with a USDA ER/EID already prepared, the Division will require that all remaining information discussed in Part B of the guidance be supplied and may require the ER/EID be reformatted into the format discussed in this guidance.

If the Applicant had previously prepared an ER/EID under the USDA guidance, it may be acceptable; however, please note that all information required under Part B of this guidance must be included in the ER/EID. Division staff may make comments to ensure that all needed information is included. If necessary, Division staff may require that the information be reformatted to fit this guidance.

Additionally, the USDA will prepare a final environmental document. Note that if the final environmental document does not adequately describe the scope of the project, then the Environmental Review Coordinator will prepare a final environmental document based on the SEPA criteria that will incorporate the scope of the project.

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Last updated: May 2015

(Last updated: May 2015)

2.0 Engineering Report/Environmental Information Document Basic Requirements

The following subchapters discuss the ER/EID outline. Additionally, they will provide the requirements for different features associated with the ER/EID.

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(Last updated: May 2015)

2.1 ER/EID Structure

2.1.1 Basic Outline

The structure of the ER/EID follows a logical train of thought. Each section within the ER/EID builds upon the previous one to present a flow of discussion. The outline the ER/EID is as follows:

- Upfront Information
- Section 1. Executive Summary
- Section 2. Current Situation
- Section 3. Future Situation
- Section 4. Need and Purpose
- Section 5. Alternatives Analysis
 - Section 5.1. Alternatives Description
 - Section 5.2. Present Worth Analysis
- Section 6. Proposed Project Description
- Section 7. Environmental Information Document⁷
- Section 8. Financial Analysis
- Section 9. Public Participation

The ER/EID prepared must follow this outline.

The upfront information contains the Table of Contents and other similar information. See [Chapter 0.0](#) of Part B for additional discussion.⁸

The Executive Summary is a “description of the project for busy people.” It should capture the entire project so that local officials, the EPA, and other interested parties can quickly gain an understanding of the project. For more information related to how to prepare the Executive Summary, see [Chapter 1.0](#) in Part B of this guidance.

The Current and Future Situations provide the basis that help to formulate the need and purpose of the project. See Chapters [2.0](#) and [3.0](#) of Part B of this guidance for more information.

⁷ The Environmental Information Document is required for projects funded through all funding programs save for the CDBG-I program. The environmental documentation for the CDBG-I program is handled under separate guidance found on the [Division’s website](#).

⁸ Section 0.0 is used to maintain the outline of the ER/EID for the discussion of requirements in the guidance.

The Need and Purpose chapter discusses how to formulate the need and purpose statement, which forms the backbone of the project. See [Chapter 4.0](#) of Part B of this guidance for more information.

The Alternatives Analysis ([Chapter 5.0](#) of Part B) discusses how the problem formulated in the need and purpose statement will be addressed. The description describes each of the alternatives considered while the present worth analysis provides cost estimates for each feasible alternative. [Chapter 5.1](#) of Part B contains more information related to the alternatives description while [Chapter 5.2](#) of Part B contains more information related to the present worth analysis.

The proposed project description provides the location of where the project in its entirety will be described. [Chapter 6.0](#) of Part B contains more information related to this section.

The EID chapter will provide the environmental information that serves as the basis for the final environmental document. [Chapter 7.0](#) of Part B contains more information related to the EID.

The financial analysis will provide information related to the financial impact to the Applicant. See [Chapter 8.0](#) of Part B for more information.

Last, the public participation section details the requirements related to ensuring that the public is informed about the proposed project. See [Chapter 9.0](#) of Part B for more information.

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(Last updated: May 2015)

2.1.2 Multiple Project Types

There may be occasions where you have a project that may contain multiple project types. If that occurs, then each project type must be addressed within the same ER/EID. This may especially occur with the CDBG-I program. The example in the purple box shows how an outline for an ER/EID with multiple project types might look. If you have a project with multiple project types and have questions about how to prepare the ER/EID, please contact the Division.

The only place where multiple project types will impact the structure of the ER/EID is in describing the current and future situations, the alternatives descriptions, and the present worth analysis. Present the remaining portions of the ER/EID as one unit.

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(Last updated: May 2015)

Upfront Information
1.0 Executive Summary
2.0 Current Situation
2.1 Collection System Rehabilitation
2.2 Collection System Expansion
3.0 Future Situation
3.1 Collection System Rehabilitation
3.2 Collection System Expansion
4.0 Project Need and Purpose
5.0 Alternatives Analysis
5.1 Alternatives Description
5.1.1 Collection System Rehabilitation
5.1.2 Collection System Expansion
5.2 Present Worth Analysis
5.2.1 Collection System Rehabilitation
5.2.2 Collection System Expansion
5.2.3 Present Worth Analysis Summary
6.0 Proposed Project Description
7.0 Environmental Information Document
8.0 Financial Analysis
9.0 Public Participation

2.2 Tables

The minor ER/EID provides for the use of tables for the bulk of the information requested. Placing information in a tabular format allows for an efficient review by the Project Manager and the Environmental Review Coordinator. Number tables to go with specific sections of the ER/EID. For example, tables within the current situation may be named Table 2.1, Table 2.2, etc.⁹ These tables will be available in Word files for use during ER/EID preparation.¹⁰

Make sure that all tables have a number and title and that all cells within the tables are completed. Incomplete tables will generate comments. If more information is necessary to explain data provided in the table, consider either footnotes to the table or a clear, concise explanation placed in text beneath the table.

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(Last updated: May 2015)

2.3 Figures

When appropriate, utilize figures to help describe the project. Figures are also helpful for those who are visually oriented because it allows them to gain a quick understanding of the project. Figures are also an easy way to describe the project and convey the location of associated resources and potential impacts. The following factors must be considered.

Figures should not be embedded in the text of the ER/EID but should be on separate pages.

- **Paper size.** Figures should not be embedded in the text of the ER/EID. Use a page that is a minimum size of 8.5 x 11 (letter) paper and a maximum size of 11 x 17 (tabloid) paper. This is because larger sizes may have to be folded several times and may fall out of the ER/EID and get lost.
- **Scale.** Figures must be at an appropriate scale to show the required information. For example, a project vicinity map would be at a greater scale than a project location map that shows the details.
- **Larger projects.** If a project is a large project such as a major interceptor, multiple maps may be required. If this is the case, provide an index map that shows the location of the different tiles with respect to the entire project.

When preparing figures, utilize the following tips:

- **Consistent basemapping.** Throughout all of the figures within the ER/EID, utilize a basemapping set that is easy to read. For example, if using a set of roadway mapping as basemapping, carry that roadway mapping throughout the remainder of the ER/EID.

⁹ Tables in the workbooks have already been numbered; however, these numbers may be adjusted to fit the needs of the ER/EID.

¹⁰ Tables in the Word file are protected; however, there is no password. To unlock files to edit, go to the Review tab in the ribbon. In the far right-hand corner, click on Protect Document and then click on Restrict Format and Editing. A Stop Protection button appears at the bottom-right corner of the screen. Click on that, and then editing will be allowed.

- **Good color contrasts.** Make sure that all features on the figures have good color contrast so that they are easy to discern. Use colors that are clearly different. Utilize shapes that have good contrast as well.
- **Aerial photography.** If aerial photography is used as basemapping, use black and white photography rather than color photography. This will allow any features shown in color to be easily discernible.
- **Good labeling.** Utilize good labeling or a legend to differentiate between the different features on the figures.

Good color contrasts – Orange, light blue, red, dark green

Not good color contrasts – medium blue, medium green, medium blue-green

Good shape contrasts – square, triangle, circle

Not good shape contrasts – octagon, circle, square with rounded corners

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(Last updated: May 2015)

2.4 Appendices

The appendices of the ER/EID contain supporting information for various portions of the ER/EID so that the body of the ER/EID consists only of required information. When preparing the appendices, utilize slip sheeting, tabs, or other ways of differentiating between each appendix. Also, to cut down on the amount of paper utilized to produce the ER/EID, place any appendices that are 25 sheets or greater on a CD or DVD. Then, in the appendices, reference the appropriate file on the CD or DVD for that particular appendix.

Appendices of 25 pages or more may be placed on a CD or DVD with reference to the appropriate file made in the appendix.

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(Last updated: May 2015)

2.5 Workbooks

The Division has developed workbooks for use in preparing the ER/EID. For minor ERs/EIDs, these workbooks must be used because they adhere to the methodologies described in [Part B](#) of this guidance. For major ERs/EIDs, they may be used, or alternative methodologies may be used. For major ERs/EIDs, the Division encourages their use.

Workbooks – Excel files designed for use with portions of the guidance found within Part B to complete various calculations.

These workbooks are in Excel format and are formatted so upon completion, the tables may be printed and placed directly into the body of the ER/EID. Each workbook begins with an Introduction worksheet that briefly

For minor ERs/EIDs, the workbooks must be used where required by Part B of the guidance.

For major ERs/EIDs, workbook use is optional but encouraged.

discusses what it contains. The next sheet is an Input sheet where the user enters the Applicant name, the project name, and any other required information. The workbook then carries this information forward to the remainder of the sheets.¹¹

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(Last updated: May 2015)

¹¹ There are no passwords protecting the workbooks. To unlock workbooks for editing, go to the Review tab and click on Unprotect Sheet. Then edit as needed.

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Part B

ER/EID Requirements

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0.0 Upfront Information

For use with projects funded or co-funded by the CWSRF, WW-HUC, WWSRL, WW-SEL, or CDBG-I programs.

The upfront information consists of information typically seen in the front of the ER/EID before the body of the report actually begins. It must include the following information:

- North Carolina Professional Engineer’s seal on the cover or title page;
- Title page
- Table of Contents
- List of Tables
- List of Figures
- List of Appendices

If there is no PE seal on the ER/EID, then the Project Manager will not review the project until it is sealed.

Applicant – The local government unit or CDBG-I grant recipient who applied for project funding

Title page. Have a title page that lists the Applicant, the project title, the consultant, and their contact information. The project title should be equivalent to the title on the funding application and provide an overarching idea of the project under consideration.

Table of Contents, List of Tables, List of Figures. The ER/EID must also have a Table of Contents. The Table of Contents should list the sections that are in the report as well as the page numbers where these sections are located. If the ER/EID is primarily tables, then the Table of Contents may suffice as the list of Tables so long as the tables are incorporated into the Table of Contents. The List of Tables (if separate from the Table of Contents) and List of Figures should list each table and figure found within the document and reference page numbers where they are located. If tables or figures take up an entire page and cannot be inserted into the body of the ER/EID, then it is acceptable to list the table or figure as “Found After Page X” or something similar.

List of Appendices. The List of Appendices must list a title for each appendix that provides enough description that shows at a glance what it contains. For appendices that contain a variety of items, specify in the List of Appendices what each appendix contains. For more information regarding appendices, see [Subchapter 2.4](#) in Part A.

For initial submittals, all appendices over 25 pages may be placed on a CD or DVD.

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[To Executive Summary](#)

(Last updated: May 2015)

1.0 Executive Summary

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, WW-SEL, and CDBG-I programs.

The Executive Summary should provide a snapshot of the overall project. Draft the Executive Summary after drafting the ER/EID and use it to summarize the key points of the ER/EID. It should contain the following:

Project description. Mention the location of the project (county and/or city), and describe the various components of the project that captures the proposed project description as discussed in [Chapter 6.0](#) of this part.

For projects that include capacity changes or like-for-like changes, list the current and proposed capacities. Include a project vicinity and project location figure and any other figures that would provide readers who would only review the Executive Summary with pertinent information about the project.

- **Project Vicinity Map.** One of the required maps is the project vicinity map. This map allows the reviewer to gain a general understanding of the project area and is critical to the review of the project since the reviewer most likely will not be familiar with the area. The vicinity map should contain the following:
 - Appropriate scaling to capture the vicinity of the project
 - The project
 - County/municipal limits as appropriate
 - Major highways
 - Major waterbodies
 - Appropriate labeling via labels or legend

Note that the project vicinity map may be used by Division staff for final environmental documents. This map should be on a 8.5x11 (letter size) paper in order to meet the submittal requirements of the SCH.

- **Project Location Map.** The second required map is the project location map. This map should be at a closer scale than the project vicinity map and should show the following as applicable:
 - Individual project components
 - Waterbodies
 - Roadways
 - County/municipal limits
 - Appropriate labeling via labels or legend

The preferred format for a project location map is a USGS topographic map with the project location

The project will expand approximately 3,100 l.f. of 8-inch pipe to 12-inch pipe. It will also rehabilitate 2,500 l.f. of 8-inch pipe, 1,000 l.f. of 10-inch pipe, and 500 l.f. of 12-inch pipe via CIPP. Last, the project will rehabilitate a 500 gpm pump station and install 5,000 l.f. of 2-inch force main.

Project – The wastewater infrastructure that will be constructed to fulfill the purpose and need.

If a roadway or waterbody is mentioned in the text, then it should be appropriately labeled on the figure for easy reference.

The Town of Anytown has had several violations of fecal coliform over the past three years. The proposed project will rehabilitate the UV system to increase treatment capability and add redundancy.

and each component clearly marked. However, if other mapping would better suit showing the project, then it may be used so long as the above-stated components are shown.

- **The reasons for the project.** Summarize the purpose and need for the proposed project. This may be one or two sentences that highlight what is described in more detail in Chapter 4.0 of this part.
- **The results of the alternatives analysis.** Briefly describe each of the alternatives considered in the alternatives analysis, including the No-Action Alternative. Discuss why each was rejected in favor of the Preferred Alternative and why the Preferred Alternative was accepted. Make sure to include both feasible and infeasible alternatives.

The Preferred Alternative consists of rehabilitating approximately 3,000 l.f. of 8-inch pipe via CIPP. This alternative has an estimated cost of \$300,000. It was accepted because it had the least environmental impact and least cost.
- **A summary of the environmental impacts and mitigative measures.** Discuss the environmental impacts of the project. Include any potentially significant impacts of the project and the mitigative measures that will be implemented to reduce those impacts.
- **Project funding and user fee increases (if applicable).** Provide information about how the project will be funded. Include total cost, sources of funding, and the amount of funding for each source. If the project contains loans, discuss how it will impact user fees.¹²

This project will be funded via a zero-interest loan through the CWSRF program. The total cost is \$306,000 with the loan portion being \$300,000. User fees, currently at \$50 a month, will rise to \$50.50 due to the project.

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[To Current Situation](#)

(Last updated: May 2015)

¹² For the CWSRF, WW-SRL, and WW-SEL programs only.

2.0 Current Situation

The current situation helps to define the project need by ascertaining the current conditions in the area where the project will be constructed. Questions that the current situation seeks to answer may include, but are not limited to, the following:

- What is the current condition of the treatment equipment at a wastewater treatment plant (WWTP)?
- What are the current flows at a wastewater treatment plant?
- Where are SSOs associated with the collection lines to be rehabilitated located?
- What are the current diameters of collection lines to be expanded?
- Is the WWTP presently outfitted to treat water to reclaimed standards?
- What water quality issues is a receiving stream for stormwater facing?
- What is the current status of a stream designated for restoration (e.g., perennial, intermittent)?
- How much rain flows from a roof designated for a rainwater harvesting project?

To aid in the preparation of the ER/EID, the Division has created both Excel workbooks and tables in Word. These are available on [the Division's website](#). Each subchapter of this guidance will specify if tables and/or workbooks are required. Also, where major ERs/EIDs may occur, this guidance provides further direction in the gray boxes.

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[To Wastewater Plant Expansion](#)

(Last updated: May 2015)

2.1 Wastewater Treatment Plant Equipment Repair and Replacement

For use with projects funded or co-funded with the CWSRF, WW-HUC, WW-SRL, WW-SEL or CDBG-I programs.

Determining the current condition of the WWTP is important for two reasons. First, it provides information related to the overall condition of the WWTP and more specifically, the condition of the equipment that will either be repaired or replaced. Second, it helps to establish the need for the project. The following sections discuss what should be included.

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(Last updated: May 2015)

2.1.1 Current WWTP Condition

Provide a brief description of the WWTP's current condition and treatment processes for both the liquid treatment train and the solids treatment train. Additionally, provide the average daily flow (ADF) of the WWTP for the past two years. Include information regarding the current capacity and the current flow at the WWTP and discuss the percent capacity currently used by the WWTP. Provide a copy of the NPDES permit limits pages and briefly discuss the permit.

Requirements

- Complete Table 2.1 and place it in the body of the ER/EID.
- Provide a project location figure prepared in accordance with [Chapter 1.0](#) of Part B of the guidance that also includes the location of the WWTP.
- Place any supporting information, such as the NPDES permit pages, in an appendix of the ER/EID and appropriately reference the appendix in the table.

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(Last updated: May 2015)

2.1.2 WWTP Treatment Train Condition

After describing the WWTP's general condition, focus the description on the liquid or sludge treatment train where the specific piece(s) of equipment proposed for repair and/or replacement are located.

Provide a flow diagram that specifies each piece of equipment within the treatment train, showing the location of the problem piece(s) of equipment. Also, show the treatment train on an aerial photo or physical diagram of the WWTP with the problem piece(s) of equipment highlighted. For each component within the train(s), provide the following information in a table:

- Type of equipment
- Size of equipment
- Age of equipment
- Condition of equipment
- Additional information as needed, such as design and peak flow hydraulic capacity, treatment capacity, horsepower, etc. For sludge dewatering/dryers, provide the rated dry pounds per hour capacity, percent solids, etc.

Condition should be determined as listed below.

- **Good.** The equipment shows little signs of wear and functions in an efficient manner with only routine maintenance. It shows minimal signs of corrosion and deterioration.
- **Fair.** The equipment shows some signs of wear and fails periodically. Some repair outside of routine maintenance is required to keep the equipment functioning. Minor upgrades provide reliability.
- **Poor.** The equipment shows signs of wear and fails on a regular basis. Repairs outside of routine maintenance occurs frequently. The equipment shows excessive signs of corrosion that limits functionality. Upgrades are needed to provide reliability.

For replacement of sludge treatment train unit processes, such as digesters, dewatering devices, or dryers, provide two years of sludge production on a monthly basis, if possible.

Supply additional information that would provide the review engineer with enough information to ascertain the overall condition of the specific treatment train where the project will occur. Include photos as needed.

Requirements

- Complete Table 2.2 and place it in the body of the ER/EID.
- Place any supporting information, including photos, in an appendix of the ER/EID and appropriately reference the appendix in the table.

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2.1.3 Specific Equipment Issues

Characterize the O&M practices for the specific pieces of equipment that will be repaired and/or replaced as part of the project. Discuss whether routine maintenance is performed in accordance with manufacturer's recommendations, standard industry practices, etc. Describe any premature failures (versus expected life) for the equipment that is being repaired and/or replaced. In addition, discuss the mechanism of the failure (e.g., lack of maintenance, improper design, unforeseen conditions) and how that mechanism will be mitigated with the proposed project.

O&M – Operations and maintenance

Last, discuss any attempts made to repair the equipment in question, including information regarding the time, efforts, and attempts made to repair the equipment within the past five years or since the issue started. If the equipment is to be replaced, describe if replacement is the better option than repair.

Requirements

- Complete Table 2.3 for each specific piece of equipment to be repaired and/or replaced as part of the project. Place the table(s) in the body of the ER/EID.
- Place any supporting information in an appendix of the ER/EID and appropriately reference the appendix in the table.

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(Last updated: May 2015)

2.2 Wastewater Treatment Plant Expansion

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, WW-SEL and CDBG-I programs.

This subchapter is to be used for projects that will result in changing to another flow sheet (e.g., higher permitted flow or lower effluent limits) and not for projects with the purpose of rehabilitating, repairing, or replacing pieces of equipment which will result in no change to the NPDES Permit flow sheet. Such projects would be considered to be a WWTP Rehabilitation, and [Subchapter 2.1](#) of this part must be used.

Please note before beginning with this project type: Ideally, the prepared ER/EID should be submitted to the Division once the new NPDES flow sheet has been issued by the DWSR/NPDES Unit (or the revised non-discharge permit has been issued). However, if this is not possible because of project time schedule, than at a minimum the prepared ER/EID should be submitted with Speculative Limits issued by the DWR/NPDES Unit. At this point, review of the ER/EID and subsequent plans and specifications will continue along the parallel review track of the updated NPDES flow limits by the DWR/NPDES Unit. Coordination by the Division and DWR/NPDES Unit will occur to ensure review time schedules are maintained as best as possible.

The Applicant will also need to apply for the Authorization-To-Construct (ATC) permit, which is issued by the DWR/NPDES Unit, and the issuance of the Approval of Plans and Specifications for SRF funding by the Division cannot proceed until the final NPDES permit is issued. Therefore, the Applicant and its consultant should be fully aware that project time schedule delays could occur if the issuance of the updated NPDES permit is delayed.

Before drafting the Need and Purpose statement, determine the reasons for the project. To do so, first characterize the current situation. The information presented in this section will provide part of the basis for the need and purpose of the project as applicable. The following subchapters discuss what to include in the current situation.

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(Last updated: May 2015)

2.2.1 Collection System Condition

Provide a brief overview of the collection system and potential issues related to the actual conditions which affect the WWTP expansion project. Include discussions of I/I and SSOs if they are related to the project.

I/I – Infiltration/Inflow
SSO – Sanitary sewer overflow
LGU – Local government unit

Requirements

- Complete Table 2.1 and place this table in the body of the ER/EID.
- Provide a figure that shows the following:
 - The basemapping as described in Subchapter 2.3 of Part A of this guidance.
 - The municipal limits of the LGU and/or county lines

- Major roadways and waterbodies with proper labeling
- Major interceptors and pump stations
- The direction of wastewater flow through the major interceptors and pump stations
- All WWTP(s) which collect(s) wastewater from the entire system, including the WWTP where the project is located (or where the new WWTP will be located)
- The WWTP service area for each WWTP in the LGU.

Place this figure in the body of the ER/EID or in an appendix with appropriate reference made in the table.

- Provide any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

Major ERs/EIDs Only

This description may be completed in full narrative format with all of the information described above included. Be sure to include the figure discussed under the Requirements section.

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(Last updated: May 2015)

2.2.2 WWTP Condition

As part of determining the need for the project, it is important to gain an understanding of the WWTP condition. An overall assessment of the condition of the WWTP provides an overview of the basics of the WWTP and the groundwork for a more detailed assessment of the specific components of the WWTP. Complete the following sections related to the WWTP.

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(Last updated: May 2015)

2.2.2.1 General WWTP Condition

Describe the general condition of the WWTP. This description should be a general description of the following:

- The basic process
- Whether the WWTP is in good working order
- The trend in flows

NPDES – National Pollutant Discharge Elimination System

SOC – Special Order by Consent

NOV – Notice of Violation

Provide the NPDES (or non-discharge) Permit Number and the permitted flow.

Discuss whether the Applicant is under a Special Order by Consent (SOC) or is currently negotiating one with the DWR. Additionally, discuss any other special orders under which the Applicant may be, such as an order by the EPA. For any of these orders, provide such pertinent information as to why the special order was issued, deadlines by which the Applicant must

comply and/or any intermediate deadlines. Provide full copies of these orders in an appendix of the ER/EID.

Include in this discussion any Notices of Violation (NOVs) that the WWTP might have incurred over the past five years.

Provide diagrams or schematics of both liquid and sludge treatment trains, noting the overall direction of flow as well as recycle loops. Also, provide a plan (or plans) which show(s) and label(s) the physical location of each unit operation and process or system of operations and processes) in sufficient detail to show and label major yard piping as well as recirculation piping and pumping.

Requirements

- Complete Table 2.2 and place it in the body of the ER/EID.
- Provide any copies of NOVs, SOCs, or Administrative Orders with appropriate reference made in the table.
- Provide both a conceptual schematic and a plan diagram in an appendix of the ER/EID with appropriate reference made in the table.
- Provide the permit in an appendix to the ER/EID with appropriate reference made in the table.
- Provide any additional supporting information with appropriate reference made in the table.

Major ERs/EIDs Only

The description may be completed in full narrative format so long the narrative includes the information described above.

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(Last updated: May 2015)

2.2.2.2 Condition of WWTP Equipment (Existing WWTPs)

To further understand the condition of the WWTP, each piece of equipment should be assessed. For WWTPs that will be modified, it will also provide the basis for the need to upgrade, modify, or replace equipment.

Provide information regarding the size, age, condition, and other pertinent information that would provide a solid assessment of each portion of the wastewater treatment process. If possible, provide photos of each piece of equipment. The equipment should include but is not limited to the following:

- Headworks structure (bar screen, grit removal, etc.)
- Major pumps (influent, effluent, recycle pumps, RAW/WAS and piping)
- Aeration basins and equipment (blowers, mechanical aerators, etc.)

- Clarifiers and effluent filters
- Disinfection, de-chlorination, and post-aeration
- Sludge treatment and storage (digesters, sludge presses, sludge pumping, etc.)
- Sludge disposal (discussion of how sludge residuals are disposed offsite and where, etc.)

Assess condition as follows:

- **Good.** The equipment shows little signs of wear and functions in an efficient manner with only routine maintenance. It shows minimal signs of corrosion and deterioration.
- **Fair.** The equipment shows some signs of wear and fails periodically. Some repair outside of routine maintenance is required to keep the equipment functioning. Minor upgrades provide reliability.
- **Poor.** The equipment shows signs of wear and fails on a regular basis. Repairs outside of routine maintenance occur frequently. The equipment shows excessive signs of corrosion that limits functionality. Upgrades are needed to provide reliability.

On a diagram, show where each piece of equipment is located within the WWTP site. Also, where possible, include photographs and reference these photographs in the description.

Requirements

- Complete Table 2.3.x for each piece of equipment. Place each table in the body of the ER/EID.
- Place any photos in an appendix of the ER/EID and appropriately reference the appendix in the table.
- Place all diagrams in an appendix of the ER/EID and appropriately reference the appendix in the table.
- Place any other supporting information in an appendix of the ER/EID and appropriately reference the table in the ER/EID.

Major ERs/EIDs Only

The description may be completed in full narrative format so long the narrative includes the information described above.

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2.2.2.3 Permit Information

Provide a discussion of limits, referring to effluent limits pages, speculative limit letters, rules, etc. For existing WWTPs to be expanded or modified, provide a copy of

Speculative effluent limits must have been issued no earlier than four years prior to the submittal of the ER/EID.

the current NPDES permit in an appendix in the ER/EID. Also provide a copy of either the newly updated flow NPDES permit or the Speculative Limits letter from the DWR/NPDES Unit. For non-discharge facilities, provide a copy of the revised permit with the new flow sheet and limits.

In general terms, discuss how the flow and/or effluent limit changes affect the proposed design of either a new WWTP or an expanded/modified WWTP. Discuss the changes in influent wastewater characteristics which need to be accounted for also.

Requirements

- Complete Table 2.4 and place it in the body of the ER/EID.
- Provide a copy of the NPDES permit in an appendix with the appropriate reference in the table.
- Place any additional supporting information in an appendix and provide an appropriate reference in the table.

Major ERs/EIDs Only

The description may be completed in full narrative format so long the narrative includes the information described above.

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2.2.3 Current Population

Use this method to determine the current population served by the Applicant's WWTP.

1. Provide the total population for the LGU.¹³

Provide the total population for the LGU by using U.S. Census data. Use the most recent estimates to date and supply the year of these estimates.

2. Provide the population density per square mile.¹⁴

Provide the number of persons per square mile based on the U.S. Census data. Select the LGU in the search box and locate the "Geography QuickFacts" at the bottom of the webpage to find the number of persons per square mile.

3. Provide the size of the LGU.¹⁵

Provide the land area of the LGU, which is located under "Geography QuickFacts" at the bottom of the webpage.

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Ibid.

4. Provide the size of the WWTP service area.

Using GIS or other appropriate mapping methods, estimate the square mileage of the WWTP service area.

Note that service area size may differ from the size of the LGU because the LGU may be served by more than one WWTP.

WWTP service area – The area of the LGU served by the WWTP.

Requirements

- Complete Table 2.5 in the [workbook](#) found under Current Population – Method 2.
- Provide any supporting information, including U.S., Census information, in an appendix of the ER/EID with appropriate reference made in the table.

Major ERs/EIDs Only

Different methodologies may be used to determine current population. If this is the case, explain in the body of the ER/EID the methodology used and why. In an appendix to the ER/EID with appropriate reference made in the body of the report, provide any assumptions made, sample calculations, and supporting information.

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(Last updated: May 2015)

2.2.4 Historical and Current Wastewater Flow

Historical flow data is a key component in assessing the need to expand a WWTP or construct a new WWTP to treat wastewater flow. Most WWTPs are required to measure the influent and/or effluent totalized flow on a daily basis.

Q_{AA} – Average annual daily flow

Q_{MM} – maximum monthly average flow

Q_{Mo-min} – minimum monthly average flow

Provide flow data for the last four years to the present for the WWTP to be modified or expanded. For a new WWTP being built, provide the flow from the existing WWTPs which will direct flow to the new WWTP, and specify the percentage of flow from each plant which will be directed to the new WWTP. Specifically, supply the average annual daily flow (Q_{AA}) and the maximum monthly average flow (Q_{MM}), and the minimum monthly average flow (Q_{Mo-min}) for each year.

Provide a discussion of the variations in a wastewater flow that specifically addresses inflow/infiltration, industrial flow, and any unique user variations (e.g., summer peak flows at a beach community). In addition, provide a discussion of the Applicant's asset management planning with respect to the collection system as it relates to addressing inflow/infiltration issues.

Requirements

- Complete Table 2.6 and place it in the body of the ER/EID.
- Provide any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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[To Future Situation](#)

(Last updated: May 2015)

3.0 Future Situation

The future situation helps to define the project need by ascertaining the future conditions in the area where the project will be constructed. Questions that the future situation seeks to answer may include, but are not limited to, the following:

- What equipment at the WWTP may fail in the future?
- What will be the flows of the WWTP by the 20-year planning window?

To aid in the preparation of the ER/EID, the Division has created both Excel workbooks and tables in Word. These are available on [the Division's website](#). Each subchapter of this guidance will specify if tables and/or workbooks are required. Also, where major ERs/EIDs may occur, this guidance provides further direction in the gray boxes.

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(Last updated: May 2015)

3.1 Wastewater Treatment Plant Rehabilitation

For use with projects funded or co-funded with the CWSRF, WW-HUC, WW-SRL, WW-SEL, and CDBG-I programs.

In addition to ascertaining the current situation, including the condition of the WWTP and specific piece(s) of equipment needing repair and/or replacement, it is important to gain an understanding of the future situation of the WWTP where the project will occur. Follow the requirements below for the completion of this section.

Discuss the role of the piece of equipment that will be repaired or replaced will play in future improvements related to the WWTP. Describe any future expansion and/or upgrades of the WWTP, including whether or not the equipment will be utilized or abandoned. If it will be abandoned, provide the expected service life of the equipment. Additionally, justify the reasons as to why it will be abandoned rather than continue to be used. Provide any supporting information such as diagrams or plans in an appendix of the ER/EID.

In addition to relating how the piece of equipment will fit into any future improvements at the WWTP, it is important to determine whether or not the equipment installed is properly sized for future flows. Provide the current ADF for the WWTP and the Year 1, Year 5, Year 10, Year 15, and Year 20 ADF.

Liquid Train improvements. Compare the ADFs for these years to the current capacity of the WWTP. If the percentage of capacity utilized will be greater than 80 percent (as required by 15A NCAC 026 .0118), then discuss the plans the Applicant has for expanding the WWTP in the future to accommodate future flows. Describe how the piece(s) of equipment to be repaired or replaced as part of the project will fit into the expansion.

Solids Train improvements. Discuss how the proposed new sludge equipment fits into the current sludge production scheme of the WWTP at current sludge production rates, and also at future sludge production rates (corresponding to WWTP flows at Year 1, Year 5, Year 10, Year 15, and Year 20). Consideration should be given to the ultimate sludge disposal methods,

including land application of biosolids if utilized, and the potential need to have more storage of biosolids.

Requirements

- Complete Table 3.1 and place it in the body of the ER/EID.
- Provide any supporting information in an appendix of the ER/EID with appropriate reference in the table.

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3.2 Wastewater Treatment Plant Expansion

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, WW-SEL, and CDBG-I programs.

The life of many pieces of WWTP equipment is expected to be 20 years, which is also the maximum term of loans made by the Division. This is important because the future situation will help establish the need for the project and will help size the WWTP accurately. This subchapter discusses what the Division needs to review in terms of population projections and flow projections.

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(Last updated: May 2015)

3.2.1 Population Projections

The design life of most projects is expected to be 20 years. Follow the steps below to determine population projections. If the service area spans multiple counties, complete the table for each county and summarize in an overall table. For some infrastructure, such as a major interceptor, the design life may be greater than 20 years. In these instances, use the design life of the project in the population projections.

Follow the steps below to determine population projections. If the service area spans multiple counties, prepare a table for each county and then prepare a table that summarizes the projections from all counties.

1. Provide the current LGU population and service area population.

Use the current LGU population and service area population.

2. Determine the county population.

For Year 1, use [U.S. Census data](#) and select the county. Enter the county population into the workbook. Use the most recent estimates to date.

3. Calculate percentage of population.

The population will be based on two parameters, the percentage of the county population that is located in the LGU and the percentage of the LGU that is located in the service area. To provide the basis for this calculation, divide the LGU population by the county population. Then divide the service area estimated population by the LGU population.

4. Determine population estimates using State Data Center (SDC) data.

Determine the year in which construction begins. This is the implementation year. Then, using information from the [State Data Center](#), determine the population projections for the next 20 years. Select “Annual County populations.” If using the WWTP Expansion workbook, enter this information into the Future Population worksheet. There may be cases where the SDC data might not extend the full 20 years. If this is the case, then determine the difference between the last two years of the estimate. Then add that estimate for each needed year.

5. Calculate the future LGU and service area populations.

Use the percentage of LGU in the county and the percentage of the LGU in the service area to determine future service area population. If using the Wastewater Treatment Plant Expansion workbook, this information will be calculated automatically.

If the service area spans multiple counties, then complete separate tables for each county. Complete a summary table showing the projected population for each county and sum the total future population for the counties and LGU(s) involved. Most importantly, show the total future service area population.

6. Provide alternative population projections from other sources (if proposed).

Other sources of data such as municipal population estimates, comprehensive plans, planned expansion, or annexations may be used to determine future population so long as the same window of time used for the SDC populations is used. To calculate the service area population, multiply the LGU future population by the percentage of the service area in the LGU. If multiple data sources are used, show the results of each source in the table as discussed below and provide supporting information in an appendix of the ER/EID. Additionally, justify the use of this data as an additional data set to be used along with the SDC data. If claiming a large, planned growth that includes signed agreements, include letters of commitment or permits to show progress on the planned growth in an appendix to the ER/EID. If no alternative population data set is proposed in lieu of the SDC, then skip this step and move to [Subchapter 3.2.2](#).

Requirements

- Complete Table 3.1 in the Wastewater Treatment Plant Expansion workbook. Print this table and place it in the body of the ER/EID.
- If alternative population projection methods are used, provide all supporting information in an appendix of the ER/EID with appropriate reference made in the table.
- Provide any supporting information in an appendix to the ER/EID with appropriate reference made in the table.

Major ERs/EIDs Only

Different methodologies may be used to determine future population. If this is the case, explain in the body of the ER/EID the methodology used and why. In an appendix to the ER/EID with appropriate reference made in the body of the report, provide any assumptions made, sample calculations, and supporting information.

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3.2.2 Flow Projections

Determining future flow is critical to ensuring that the project is properly sized to accommodate future flows. Since population projections determine flows, be sure to complete the population project as discussed in Subchapter 3.2.1 above.

The design flow for a NPDES permitted facility is defined as the maximum monthly flow. Therefore, the current flow is based on the average of the last four years of Max. Month flows (see [Subchapter 2.2.4](#) of this part). Utilize [Equation B.3.1](#) below to calculate future flows. If the design life of the project is 20 years or greater, calculate the future flow at Year 20 using this equation. If the design life is less than 20 years, then do a year-by-year flow projection and explain how this project fits in with the future expansions to accommodate the 20-year design flow.

If the WWTP service area expansion can be described as a well-defined residential/commercial area, use North Carolina 2T Standards, [15A NCAC 02T .0114](#) to characterize the future flow.

$$Q_{20} = Q_{MMcurrent} + \left(100 \frac{gpd}{capita}\right) + (\Delta P) + Q_{other}$$

- Q_{20} = Design Flow (Max. Month) for Year 20
- $Q_{MMcurrent}$ = Current average Max. Month for WWTP
- Q_{other} = Industrial or other known non-residential and non-commercial flow. This future industrial flow must be documented.
- $P_{current}$ = Population for current year
- P_{20} = Population at Year 20
- ΔP = Population at Year 20 - $P_{current}$

Equation B.3.1. Flow Projection Calculation

Different methodologies may also be used for flow projections. In the body of the ER/EID, explain the methodology used and present the results. All supporting information, assumptions made, and calculations should be provided in an appendix to the ER/EID.

Requirements

- Complete Table 3.2 in the Wastewater Treatment Plant Expansion [workbook](#) and place in the body of the ER/EID.
- If alternative flow projection methods are used, provide all supporting information in an appendix of the ER/EID with appropriate reference made in the table.
- Provide any supporting information in an appendix to the ER/EID with appropriate reference made in the table.

Major ERs/EIDs Only

Different methodologies may be used to determine future flow. If this is the case, explain in the body of the ER/EID the methodology used and why. In an appendix to the ER/EID with appropriate reference made in the body of the report, provide any assumptions made, sample calculations, and supporting information.

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3.3 Energy Efficiency

For projects funded or co-funded with the CWSRF-GPR only.

Some WWTP equipment rehabilitation and replacement projects or upgrade/expansion projects may have a primary purpose of energy usage reduction or energy generation. Having such a focus would allow for funding via the CWSRF Green Project Reserve (CWSRF-GPR).

CWSRF-GPR – CWSRF Green Project Reserve

If seeking funding via the CWSRF-GPR due to energy usage reduction, complete calculations that document at least a 20 percent energy usage reduction for the specific unit process involved. This should not include the entire WWTP unless the entire WWTP is being upgraded. Complete the calculation based on the existing equipment name plate data with the understanding that the existing equipment may currently be operating at a lower overall efficiency than at the time of installation.

If the project will be to install specific energy-producing equipment such as digester gas/heat-fed combined heat and power generator system or offset the electrical energy demand at the WWTP, then the calculations must show the average WWTP electrical energy usage compared to the energy generated.

All calculations must be replicable by the Division

Example of Energy Efficiency Projects

Replacement of coarse air bubble diffusers with fine air bubble diffusers in the aeration basins. Calculations would involve comparing the lower efficiency coarse air bubble diffusers with the fine bubble diffusers. They would also include the comparison of energy usage of the newer, higher efficiency air blowers with the existing installed blowers.

Project Manager.

Requirements

- Complete the needed energy reduction or energy generation calculations. Place these calculations in an appendix to the ER/EID.
- In the body of the ER/EID, provide a narrative discussion of the energy reduction calculations.
- In the body of the ER/EID, provide graphics or other information that will help to summarize the energy reduction or usage.
- Place any additional documentation in an appendix of the ER/EID.

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[To Need and Purpose](#)

(Last updated: May 2015)

4.0 Need and Purpose

Use this section for projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, WW-SEL, or CDBG-I programs.

Often, a project's need and purpose are not readily evident unless the reader is already familiar with local conditions and the origins of the problems that give rise to the request for funding. The need and purpose statement, which is also required under NEPA or SEPA, provides a way to crystallize why the project is being proposed. The need and purpose for the ER and the EID should be the same in that it will clearly frame the problem and provide the basis for determining the solution.¹⁶

Use draft the need and purpose statement using the steps listed below.

1. Complete the analysis of the current and future situation according to the project type-specific guidelines in Subchapters 2.0 and 3.0 of this part.

The need and purpose should directly correlate to the analysis of the current and future situations associated with the project will help to define more clearly the need and purpose of the project.

2. Base the need statement on the results of the current and future situation analysis.

Use the need statement to answer, "Why does the Applicant need the project?" After the current and future situation analyses are complete, themes should emerge as needs for the project.

Additionally, the need statement should highlight why the project is a priority in the Applicant's capital improvement plan (CIP) or similar document. The box to the right shows an example need statement for a town has a WWTP that is in need not only of expansion to accommodate growth but also updating to make major repairs and meet discharge limits.

Need statement – A brief description of the reason why an Applicant must construct a project.

CIP – Capital improvement plan

The Town of Anytown is faced with an aging WWTP which contains equipment that is beyond the recommended lifespan. The Anytown CIP has made replacing this equipment a priority because of the impacts to O&M costs and effluent quality. Additionally, the DWR has required that all municipalities within the basin reduce their nutrient discharges into the river. Last, the Town is experiencing growth at moderate levels, and the WWTP is approaching 80 percent of the capacity and is required to begin planning for future needs with 90 percent reached within five years.

¹⁶ Note that for the CDBG-I program, the need and purpose statement should be the same even though the Responsible Entity completes the environmental documentation. *The Responsible Entities and its representatives must work closely with the Recipient and its engineering consultants to ensure a consistent purpose and need statement.*

3. Draft the purpose statement.

The purpose statement should answer the question, “How will the Applicant address the project need?” Explain why this particular project has been proposed. Also provide the context in how the project fits with other related projects in the Applicant’s CIP (e.g., the funded project may address only portions of the need, and subsequent phases may address the remaining need. The purple box shows an example of the purpose statement on the previous page.

Purpose statement – A brief description of how the project will address the need.

The purpose of the proposed project is to implement the Town’s capital improvement plan to meet our regulatory obligations, protect the environment by improving treatment reliability, and accommodate future growth by the upgrade of the Anytown TTWP through process improvements.

3. Correlate the need to the purpose.

Correlate the need and purpose statements. Note that this section should be as short and succinct as possible. However, it should provide sufficient detail to correlate the statements. The two examples above can be combined into one paragraph for a complete need and purpose statement.

Requirements

Complete Section 4.0 within the ER/EID by writing a succinct need and purpose statement.

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[To Alternatives Analysis](#)

(Last updated: May 2015)

5.0 Alternatives Analysis

The alternatives analysis provides proposed solutions to the problem formulated by drafting the need and purpose statement. The entire analysis consists of two main parts:

- The alternatives description
- The present worth analysis

This subchapter details the requirements for each part, which will then feed into the proposed project description discussed in [Chapter 6.0](#) of this part.

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(Last updated: May 2015)

5.1 Alternatives Description

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, WW-SEL, and/or CDBG-I programs.

The alternatives description discusses the different alternatives considered as solutions to the need and purpose. Most alternatives are specific to project type. However, the No-Action alternative must be considered for all projects. [Subchapter 5.1.1](#) of this part discusses what the No-Action Alternative should include. Also, the analysis requires a discussion of the Preferred Alternative. [Subchapter 5.1.2](#) of this part discusses what the Preferred Alternative must contain.

Requirements

For each alternative, complete Table 5.x provided in Chapter 5 of the Word document provided on the [Division's website](#). The Division recommends completing the alternative that most likely will be the Preferred Alternative first, as some of the information for the rejected alternatives requires a comparison between the Preferred Alternative and the rejected alternative. The following cells must be completed as described below.

- **Description.** In this cell, provide all of the information discussed for your specific project type in Subchapter 5.1.3. If a figure is available, include the figure in the body of the ER/EID or an appendix and provide the appropriate reference in the table.
- **Alternative Feasibility.** Based upon the description, check the appropriate box as to whether it would be feasible to construct the project or infeasible. [Subchapter 5.2](#) of this part defines feasible and infeasible projects.
- **Costs.** If the project is feasible, include both the capital cost and total present worth as calculated using the methodology discussed in [Subchapter 5.2](#) of this part.
- **Water Use, Reuse, Recapture, and Conservation (CWSRF funded or co-funded projects only).** Due to the passage of the Water Resources Reform and Development Act of 2014 (WRRDA), all applicants are required to consider as part of the alternatives analysis the impact of each alternative on water use, recapture, and conservation. For some project

WRRDA – Water Resources Reform and Development Act of 2014

types (e.g., stormwater BMPs, collection system rehabilitation/replacement), this analysis will not apply due to the nature of the project type. Two examples would be the replacement of a pump station and force main in a collection system project or the construction of a wetland to serve as a stormwater BMP. The subchapters in [Subchapter 5.1.3](#) of this part provide direction on how to address the water use, reuse, recapture, and conservation requirements.

- **Energy Conservation (CWSRF funded or co-funded projects only).** The passage of the WRRDA also requires Applicants to address energy conservation as part of the alternatives analysis. For some project types (e.g., stormwater BMPs, wetland/buffer/stream restoration), energy conservation will not be applicable. For other project types such as collection system rehabilitation/replacement or collection system expansion, the scope of the project may render this requirement not applicable. For other project types, the nature of the project type or scope of the project will require that the Applicant address this issue. The subchapters in [Subchapter 5.1.3](#) of this part provide direction on how to address energy conservation requirements.

- **Environmental Impact Description.** In this cell, very briefly provide a qualitative description for the Preferred Alternative first. Then for each rejected alternative, qualitatively compare the alternative under consideration to the Preferred Alternative. The purple box to the right gives an example of an environmental impact description.

The WWTP Expansion project will create noise and air emissions during project construction that may impact nearby residents. To mitigate these impacts, the Applicant will restrict construction hours to daylight hours during the week that are not on holidays.

- **Environmental Impact Analysis.** Check the appropriate box. For the Preferred Alternative, check the box Preferred Alternative. For the others, compare the qualitative impact descriptions as to whether it is greater than, less than, or the same as the Preferred Alternative.
- **Acceptance/Rejection.** Check the appropriate box as to whether the alternative considered is the Preferred Alternative (e.g., Accepted) or rejected.
- **Rationale for Acceptance/Rejection.** In this cell, describe why the alternative was either accepted as the Preferred Alternative or rejected. Consider such factors as the following:

- Cost
- Environmental impact/benefit
- Safety
- Long-range planning

While slightly more expensive than the rehabilitation of equipment, replacing the aeration system at the WWTP will allow the WWTP to complete future expansions without changing out the aeration basin.

Keep in mind that the Preferred Alternative may not necessarily be the least costly option, as other factors may be a consideration. The purple box to the right shows an example of how the Rationale for Acceptance/Rejection might be completed.

The remaining subchapters discuss what alternatives must be considered for each project type.

Major ERs/EIDs Only

- Narrative may be used for each alternative considered in the alternatives analysis.
- Complete the requirements as set forth in this subchapter and ensure that all elements discussed are included in the alternatives analysis.

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5.1.1 No-Action Alternative

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, WW-SEL, and/or CDBG-I programs.

The No-Action Alternative, which some people call the Do-Nothing alternative, must answer the question, “What would happen if the Applicant did nothing?” Discuss what will happen if no project were constructed. Detail information such as further equipment deterioration, higher operations and maintenance (O&M) costs, increased water quality impairment, and high safety risks to the general public and utility employees.

No-Action Alternative – The alternative that describes what happens if a project were not constructed.

O&M – Operations and maintenance

All projects must consider the No-Action Alternative as part of the alternatives analysis.

Note that many times, a No-Action Alternative may be considered infeasible, but on occasion, it may be feasible. If it is feasible, then complete a present worth analysis for it. The alternatives analysis for the No-Action Alternative will contain O&M costs and replacement costs but no capital costs. Please see [Subchapter 5.2](#) of this part for definitions of “feasible” and “infeasible.” The purple box to the right shows an example of a No-Action Alternative description.

If the No-Action Alternative were implemented, then the project would not be constructed. The pump station would continue to deteriorate with increasing O&M costs. Additionally spill risk would increase. Finally, worker safety would remain an issue.

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5.1.2 Preferred Alternative

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, WW-SEL, and/or CDBG-I programs.

Most of the time, the Preferred Alternative will be one of the alternatives described in [Subchapter 5.1.4](#) of this part. Other times, the Preferred Alternative will not be any of those alternatives. If that is the case, thoroughly describe the Preferred Alternative using the tables discussed in [Subchapter 5.1](#) of this subpart.

There may be cases in which there is only No-Action and a Preferred Alternative. If that is the case, then provide a justification as to why only these two alternatives were considered.

However, note that for the vast majority of projects, all alternatives in the subchapters discussed must be considered.

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5.1.3 Water Resources Reform and Development Act of 2014 Requirements

For use with projects funded or co-funded by the CWSRF only.

If the Applicant's project will utilize a CWSRF loan, then the Applicant must take into consideration requirements related to the WRRDA, including water use, reuse, recapture, and conservation as well as energy conservation. The following subchapters provide guidance on how to address these two topics

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5.1.3.1 Water Use, Reuse, Recapture, and Conservation

For some project types, addressing issues related to water use, reuse, recapture, and conservation may not apply. These project types would be

- Stormwater best management practices
- Stream/buffer/wetland restoration

If this is the case, then in the section of Table 5.y related to water use, reuse, recapture, and conservation, check the first box that states that the project is not applicable to the water use, reuse, recapture, and conservation requirements due to project type. This must be done for all alternatives considered, including the No-Action Alternative.

For the other project types, the scope of the project may render addressing this issue as not applicable. For example, a collection system rehabilitation project may consist of replacing a pump station and force main. If this is the case, then in the section of Table 5.y related to water use, reuse, recapture, and conservation, check the second box stating that the project scope renders the project not applicable to the water use, reuse, recapture, and conservation requirements.

Other projects, especially those related to wastewater treatment plant expansions and reclaimed water, can involve water use, reuse, recapture, and conservation. If this is the case, then check the third box and complete the analysis for water use, reuse, recapture, and conservation as described below.

The analysis for water use, reuse, recapture, and conservation should be a qualitative and brief analysis that compares all rejected alternatives, including the No-Action Alternative, to the Preferred Alternative.

Begin with the Preferred Alternative. Check the appropriate box in Table 5.y. Briefly discuss how the project will impact water usage, including whether or not efforts will be made to reuse or recapture water and how water will be conserved. The purple box contains an example of how the text might look.

For the No-Action Alternative, check the appropriate box in Table 5.y. Briefly discuss how not implementing the project would impact water use, reuse, recapture, and conservation. The purple box to the right contains an example of how the text might.

For all other rejected alternatives, repeat the process, only compare the alternatives to the Preferred Alternative and check the appropriate box in Table 5.y. The purple box to the right contains an example of how the text might look for a WWTP expansion project.

If water use, reuse, recapture, or conservation measures played a significant role in alternative acceptance, or rejection, state as such and *briefly* explain why this is the case. If the Preferred Alternative does not use, recapture, or conserve water as much as a rejected alternative, then state as such and *briefly* explain why the alternative was chosen despite this lack of conservation.

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(Last updated: May 2015)

5.1.3.2 Energy Conservation

For some project types, addressing energy conservation measures will not apply. These project types include the following:

- Stormwater BMPs
- Stream/buffer/wetlands restoration
- Rainwater harvesting

For other projects, the scope of the project may mean that energy conservation measures will not apply. Some examples of a project scope include:

- Replacement of pipe *only* during a collection system replacement/rehabilitation project
- Installation of a new interceptor *only*

Other projects, especially those related to the WWTP or pump stations, can have energy conservation impacts that must be discussed. The analysis for energy conservation should be

Water Use, Reuse, Recapture, and Conservation – WWTP Expansion

Preferred Alternative

The WWTP expansion project will include the use of rainwater harvesting measures to harvest rain off of buildings as well as reclaimed water capabilities. Both the rainwater harvested and reclaimed water will be used to provide washdown water at the WWTP. Reclaimed water will also be sold to local landscaping companies on a bulk level. Last, water conservation measures will be implemented inside all buildings and will include low-flow toilets and automatic faucets.

No-Action Alternative

Since the project would not be implemented under this project, no water use, reuse, recapture, or conservation measures will be implemented. The WWTP would continue to utilize outdated water fixtures and would not construct rainwater harvesting or reuse facilities.

Rejected Alternative

This alternative would incorporate the same measures as the Preferred Alternative. Therefore, water use, reuse, recapture, and conservation would be the same as the Preferred Alternative.

brief and qualitative and compare all rejected alternatives, including the No-Action Alternative, to the Preferred Alternative. Note: If points were claimed for energy efficiency, then energy conservation should be discussed in greater detail than otherwise described in this subchapter. Refer to other tables within the ER/EID related to energy efficiency as needed.

For this analysis, begin with the Preferred Alternative. Check the appropriate box in Table 5.y. Discuss any energy efficiency measures that will be implemented as part of the project. The purple box at the right provides an example of how this example might look.

For the No-Action Alternative, check the appropriate box in Table 5.y. Briefly discuss how not implementing the project will impact energy usage. The purple box to the right provides an example of how this discussion might look.

For all other rejected alternatives, check the appropriate box in Table 5.y as to whether or not the energy conservation measures would save more or less energy than the Preferred Alternative. Briefly discuss why this would be so. The purple box to the right provides an example of how this discussion might look.

If energy conservation measures played a significant role in alternative acceptance, or rejection, state as such and *briefly* explain why this is the case. If the Preferred Alternative does conserve energy as much as a rejected alternative, then state as such and *briefly* explain why the alternative was chosen despite this lack of conservation.

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5.1.4 Project-Type-Specific Alternatives Descriptions

In addition to the No-Action Alternative and the Preferred Alternative (if different from the descriptions below), alternatives descriptions that are specific to the different project types considered in this guidance must be examined.

Each project type will note for which programs they can be used.

Energy Conservation – Pump Station Replacement

Preferred Alternative

The Preferred Alternative will incorporate variable frequency drives at the influent pump station, upgraded SCADA and solar panels. The VFDs will allow for a more efficient usage of energy by adjusting the speed at which the pumps will operate. Additionally, the solar panels will provide energy to light the security lights around WWTP site. This will reduce the amount of energy drawn from the power grid.

No-Action Alternative

If the No-Action Alternative were implemented, then energy usage would continue to increase as the pumps and circuitry deteriorate.

Rejected Alternative

Alternative A would not include solar panels and would utilize pumps that are not VFDs but would include upgraded SCADA. Despite the upgraded SCADA, the pumps would not run as efficiently as the VFDs. Therefore, the energy conservation would be less than that of the Preferred Alternative.

Each project type below will note the funding programs for which the subchapter may be used.

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[To Wastewater Treatment Plant Expansion](#)

(Last updated: May 2015)

5.1.4.1 Wastewater Treatment Plant Rehabilitation

For use with projects funded or co-funded with the CWSRF, WW-HUC, WW-SRL, WW-SEL, and CDBG-I programs.

Each alternatives description must include the following:

- A description of each alternative as discussed in the subchapters below. Where appropriate, include figures and maps.
- For feasible alternatives, preliminary design information for the project, including preliminary design criteria for all proposed unit processes and operations, detention times, aeration requirements, tank and pump sizes, sludge handling and biosolids disposal of alternatives, etc. sufficient to evaluate the project.
- For feasible alternatives, the capital cost and present worth derived from the present worth analysis discussed in [Subchapter 5.2](#) of this part.
- For all alternatives, a discussion regarding why the alternative was accepted or rejected (see [Subchapter 5.1](#) of this part of the guidance).

The following subchapters describe these alternatives. Be sure to include the No-Action Alternative (see [Subchapter 5.1.1](#) of this part of the guidance) as part of the analysis, and if the Preferred Alternative (see [Subchapter 5.1.2](#) of this part of the guidance) is different from those discussed below, describe it as well.

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5.1.4.1.1 Optimum Operation of Existing Equipment

In this description, discuss how the existing facilities could be optimized to improve performance without making any upgrades beyond those that would occur as part of normal maintenance. Discuss what would happen to the WWTP if this alternative were implemented. In the rationale, describe why this alternative alone was accepted or rejected.

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5.1.4.1.2 Repair of Specific Equipment

In this alternative, discuss the effect of specific repairs to the equipment. Discuss the validity for these repairs in detail, and provide rationale for acceptance or rejection. Items considered routine maintenance (such as cleaning out aeration basins) are not acceptable alternatives by themselves,

yet they may still be eligible for loan funding if it is required for repair or replacement of internal mechanisms.

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5.1.4.1.3 Alternative Replacement Equipment Considered

Under this alternative, discuss the different types of equipment considered for the rehabilitation and/or replacement project. Each type of equipment combination must be its own separate alternative.

For example, alternatives could consist of different configurations (e.g., influent pump station-dry well/wet well, duplex/triplex, etc.) or treatment alternatives (e.g., solids dewatering – gravity belt/centrifuge, etc.) or cloth disc filter – deep bed filters. In the rationale, describe why the alternative(s) alone was (were) accepted or rejected.

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5.1.4.2 Wastewater Treatment Plant Expansion

For use for projects funded or co-funded with the CWSRF, WW-HUC, WW-SRL, WW-SEL, and CDBG-I programs.

Each alternative's description must include the following:

- A description of each alternative as discussed in the subchapters below. Where appropriate, include figures and maps.
- For feasible alternatives, preliminary design information for the project, including preliminary design criteria for all proposed unit processes and operations, detention times, aeration requirements, tank and pump sizes, sludge handling and biosolids disposal of alternatives, etc. sufficient to evaluate the project.
- For feasible alternatives, the capital cost and present worth derived from the present worth analysis discussed in [Subchapter 5.2](#) of this part.
- For all alternatives, a discussion regarding why the alternative was accepted or rejected (see [Subchapter 5.1](#) of this part of the guidance).

The following subchapters describe these alternatives. Be sure to include the No-Action Alternative (see [Subchapter 5.1.1](#) of this part of the guidance) as part of the analysis, and if the Preferred Alternative (see [Subchapter 5.1.2](#) of this part of the guidance) is different from those discussed below, describe it as well.

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5.1.4.2.1 Optimum Operation of Existing Facilities

In the description of this alternative, discuss how the facilities at the WWTP could be optimized to improve performance without making any upgrades beyond those that would be a part of normal maintenance procedures. In the rationale, describe why this alternative was accepted or rejected as a stand-alone alternative, including its feasibility.

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5.1.4.2.2 Land Application

Describe the land application alternative only if the following criteria are met:

- Located in the Piedmont Physiographic Province with a projected increase in wastewater flow less than 130,000 gallons per day
- Located in the Coastal Plains Physiographic Province with a projected increase in wastewater flow less than 330,000 gallons per day¹⁷

If describing the land application alternative, discuss what type of application is under consideration (e.g., reclaimed water, conventional spray irrigation). Loading rates may be based on general knowledge of soils and estimated loading rates based on other facilities' permitted loading rates for similar soils or published hydraulic conductivity values.

Provide the rationale as to why this alternative was accepted or rejected as a stand-alone alternative, including its feasibility.

Currently, no land application facilities exist in the Mountains Physiographic Province. If the proposed project is to install a land application in this area, please contact the Division.

Stand-Alone Alternative – An alternative that is the only alternative considered rather than part of a combination of alternatives (e.g., optimizing existing facilities only rather than optimizing facilities and considering land application as well).

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5.1.4.2.3 Decentralized Systems

Discuss whether decentralized systems would be a viable alternative. The discussion of the proposed treatment system should identify whether onsite systems (such as septic tanks with drain fields, at-grade systems, mound systems, media filters, small aerobic units, pressure distribution systems, etc.) could be utilized. Identify cluster systems (which would serve two or more dwellings but less than an entire community). For cluster systems, describe the various treatment components and discuss the overall treatment strategy.

¹⁷ If a new WWTP is being built, then these limits apply to the new facility (e.g., in the Coastal Plain, a new facility with a 330,000 gpd flow).

Specify the provisions for wastewater minimization and for diverting extraneous waters from the wastewater system (e.g., cooling system condensate discharges).

Discuss any proposed phasing schedule for facilities and system components.

Provide the rationale as to why this alternative was accepted or rejected as a stand-alone alternative, including its feasibility.

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5.1.4.2.4 Regionalization

Regionalization has been a goal that has been supported by the DENR, and it must be examined for WWTP construction, expansion, or modification. Note that regionalization may include not only constructing, expanding, or modifying a WWTP to serve more than one Applicant but may also consist of bringing wastewater service for more than one Applicant under one management umbrella such as a sanitary district

If this project has a regionalization alternative that will move forward, a copy of the draft Interlocal Agreement must be provided in an appendix to the ER/EID.

ILA – Interlocal Agreement

Describe what type of regionalization will occur (e.g., management, physical interconnection). If more than one combination of regionalization was considered, then each combination should be its own alternative. For any regionalization alternatives that move forward in the analysis, provide the interlocal agreements (ILAs) or drafts of ILAs. On a figure, show what entities will be impacted by the regionalization. If infrastructure is involved, show this infrastructure on the figure.

Provide the rationale as to why this alternative was accepted or rejected as a stand-alone alternative, including the feasibility. If the Applicant is already a regional provider, then this alternative does not need to be investigated. In this case, provide information related to regionalization activities in the past.

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5.1.4.2.5 Consideration of Construction/Expansion/Modification Using at Least Two Treatment Technologies

Consider at least two types of treatment technologies appropriate for the proposed effluent limits must be considered. Each must be a separate alternative in the ER/EID. For instance, if the (speculative) effluent limits do not involve nutrient removal, two of the many variations of the activated sludge process may be considered. However, if nutrient removal is a requirement, then both alternatives must be biological nutrient removal (BNR) processes (e.g., Bardenpho, modified Ludzack-Ettinger). For each treatment technology, discuss the processes involved and provide diagrams that show each.

Provide the rationale as to why this alternative was accepted or rejected as a stand-alone alternative, including its feasibility.

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5.1.4.2.6 Biosolids Alternatives Description

At least two types of biosolids disposal alternatives must be considered (e.g., land application, biosolids drying). Each must be a separate alternative in the ER/EID. For each biosolids disposal alternative, discuss the processes involved and provide diagrams that show each. Each alternative must include sludge reduction calculations and how the alternative will adhere to the sludge and vector reduction requirements as discussed in [40 CFR Part 503](#). Additionally, show that the required volume for sludge digestion as well as the residual storage [30 days minimum per [15A NCAC 02T .0505\(o\)](#)] is provided.

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5.1.4.3 Energy Efficiency

For use with projects funded or co-funded by the CWSRF-GPR only.

If the primary purpose of the project is to reduce energy usage or to generate power, then the alternatives description must incorporate an analysis of energy reduction or generation as applicable.

Use the energy efficiency analysis completed as the basis for the discussion of energy conservation related to WRRDA.

For determine the energy reduction or power generation of the Preferred Alternative first. Then compare the [No-Action Alternative](#) to it. Last, compare each rejected alternative to [the Preferred Alternative](#). Energy reduction or generation must be a consideration when comparing alternatives.

Once the analysis is complete, provide a very brief summary in the portion of Table 5.y that discusses energy conservation measures as a way to fulfill the WRRDA requirements (see [Subchapter 5.1.3.2](#) of this part. Refer to the energy efficiency sections of the ER/EID for more detail.

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5.2 Present Worth Analysis

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, WW-SEL, and/or CDBG-I programs.

The present worth analysis is a numerical calculation that leads to vital information related to a project since many decisions related to the Preferred Alternative may consider project costs. To determine whether or not you need to complete a present worth analysis for an alternative, decide if the project is feasible.

Feasible alternatives are those that are constructible regardless of cost. Infeasible alternatives are those that are not constructible. *A present worth analysis should be conducted for all projects considered to be feasible, even if the project is a No-Action Alternative.*

The present worth analysis consists of four steps:

- Determination of capital costs
- Determination of replacement costs
- Determination of operations and maintenance (O&M) costs
- Calculation of total present worth

Requirements

The Division's website contains a [present worth analysis workbook](#) that must be used for all projects with a minor ER/EID. The workbook contains the Table of Contents as well as a

Major ERs/EIDs Only

- The Applicant's own calculations may be used for the present worth analysis, or the [workbook](#) provided by the Division may be used. If using alternate calculations, then both a justification for the different methodology and a sample calculation so that Division staff can replicate them.
- Any alternative methodologies used to calculate the present worth must fulfill the requirements as set forth in this subchapter.

worksheet showing the equations that are used in calculating each step. Complete the tables in this workbook and place those used in the body of the ER/EID.

The subchapters below discuss each step. For more information about the calculations used in the analysis, please see the [workbook](#).

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A present worth analysis must be completed for feasible alternatives only.

Feasible – An alternative that can be constructed regardless of cost.

Infeasible – An alternative cannot be constructed.

Example of infeasible alternatives:

- Replacement of lines under a building
- Do not place blank tables in the ER/EID. Only include those that you have completed as part of your analysis.

station that has a history of notices of Violations

5.2.1 Determination of Capital Cost

Capital costs related to the construction of the project and will be used not only for the present worth analysis but also for an analysis of the total project cost found in [Chapter 8.0](#) of this part. The capital costs consist of the following:

- Construction costs
- Administrative costs
- Contingency costs

Construction costs consist of the cost for line items used to build the project (e.g., pipe installation, pumps, concrete). Administrative costs include costs such as mobilization and engineering fees.¹⁸ For engineering services costs, include actual costs even though the eligible reimbursement costs may be less. Include the costs associated with patent fees, engineering, startup services, land and easements, etc. Contingency costs are defaulted to ten percent during the planning stage but may be adjusted to higher or lower *so long as justification is provided*. This contingency may also be adjusted later in the funding process.

Unless adequate justification can be provided, use a 10 percent contingency for capital costs.

In the workbook, complete the capital cost tables with the required information related to administrative costs, project components, unit costs, the type of unit (e.g., linear feet, cubic yard), and the quantity. The workbook will then calculate the total capital cost.

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5.2.2 Determination of Replacement Costs

Over the course of the 20-year project horizon used for grants and loans, equipment may need to be replaced. Consider the project life cycle for each major element of the project such as pipe, pumps, and BMP vegetation. Use the Life Cycle table in the workbook to list out those life cycles. Then complete the Replacement Costs – Entry table for each feasible alternative. The workbook will calculate the replacement costs in the appropriate years.

Examples of replacement costs:

- Security fencing
- Pumps used all of the time
- Equipment exposed to corrosion

When printing tables for the ER/EID body, there is no need to print the Replacement Cost Entry table.

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¹⁸ Not all administrative costs may be eligible. Please see the SRF eligibility guidance document for additional information.

5.2.3 Determination of Operations and Maintenance Costs

The next step of the present worth analysis is to consider the O&M costs associated with each feasible alternative. The Division defines two types of O&M costs: annual and intermittent. Note that the O&M costs to be considered should be related to the project only. These costs will factor into the financial analysis discussed in [Chapter 8.0](#) of this part.

Note that the No-Action Alternative may be feasible and have O&M costs only associated with it. For example, if a pump station can continue functioning if no action is taken, it may require increasing maintenance over the years. Additionally, keep in mind that O&M costs can be negative. If the pump station discussed above were replaced by a new pump station, then the O&M costs might decrease.

Annual O&M costs consider costs that occur on an annual basis such as for salaries and benefits of additional employees for the project, chemical costs, and energy costs. For those costs, enter each as a line item in the Yearly O&M Costs tables in the [workbook](#). Then print those tables and place them in the body of the ER/EID.

Intermittent O&M costs are those costs that may not occur on an annual basis but are O&M costs that will occur at some point during the 20-year project horizon. To analyze the intermittent O&M costs, go to the Intermittent O&M Entry sheet in the workbook and enter each intermittent O&M cost and a “Y” for each year it may occur. The workbook will calculate this particular cost. Print the appropriate sheets and place them in the body of the ER/EID.

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5.2.4 Calculation of Total Present Worth

Once the capital costs, replacement costs, and O&M costs are calculated, then determine the total present worth. The [workbook](#) will determine the total present worth automatically. Print this sheet and place it in the workbook along with the other sheets as mentioned above.

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O&M – Operations and Maintenance

Yearly O&M costs – O&M that occurs on an annual basis.

Intermittent O&M costs – O&M that occurs during the 20-year project horizon but not on a yearly basis.

O&M Costs must relate to the project only.

Yearly O&M Costs Examples

- Chemicals for wastewater treatment
- Energy usage
- Pipeline inspections
- Salaries for additional employees required for project

Intermittent O&M Costs

- Pump refurbishment
- BMP refurbishment
- Clarifier concrete maintenance

For alternatives, the O&M costs can be negative if the alternative results in less maintenance costs.

When printing tables for the ER/EID body, you do not need to print the Intermittent O&M Entry table.

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6.0 Proposed Project Description

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, WW-SEL, and/or CDBG-I projects.

The proposed project description plays a vital role, as Division staff use it to draft approval letters and final environmental documents and to compare to project scopes presented later in the funding process. Division staff will check this description to ensure that it matches the descriptions presented in the Executive Summary as well as the Alternatives Description for the Preferred Alternative. Because of this, the description must be detailed and accurate.

If the project involves multiple project types, then combine these types into one overall project description based upon the requirements below.

Requirements

Use a text format to complete the proposed project description. The description must be succinct yet contain the information required below.

All descriptions must include the following:

- General Description
 - Location of the project (e.g., county/municipality). Include location maps
 - Number of acres of land to be disturbed
- Environmental impacts
 - Stream and wetland impacts
 - Other environmental impacts, including site improvements to be made such as grading, filling, landscaping, etc.
 - All associated mitigative measures to minimize the impacts
- Project costs
 - Total present worth
 - Capital Cost

For wastewater treatment plant projects (e.g., rehabilitation, upgrade, expansion):

- Any equipment that will be installed/replaced/improved
- Capacities of new and/or improved equipment
- If claiming energy reduction points for a green project, the amount of energy that will be saved
- New treatment processes (if any) that will be constructed
- Existing treatment processes that will be upgraded
- Level of treatment and capacity to be provided
- If the project will include construction of administrative facilities, discuss the square footage and height of the buildings, the proposed use(s) of buildings, the number of parking spaces in parking lots or decks associated with the buildings, and the amount of paved or otherwise impermeable surfaces.

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7.0 Environmental Information Document

The Division requires some level of environmental review for all funding programs. As discussed in [Subchapter 1.1](#) of Part A of this guidance, the level of environmental review depends upon the funding source and whether or not the project is above the minor construction activities criteria.

If the Applicant's project is funded or co-funded with CDBG-I funds, the environmental documentation preparation process is a completely separate process completed by the Responsible Entity.

Please note that the CDBG-I program has a separate environmental process that must be used if the Applicant's project is funded or co-funded with CDBG-I funds. Please see the [CDBG-I web page](#) on the Division's website for more information.

Projects that are funded through the WW-SRL, WW-SEL, or WW-HUC only are required to complete a limited EID to check for any issues that might trigger external agency concerns.

The remaining sections in this chapter provide an overview of the ER/EID and discuss specific requirements related to each of the resource categories.

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7.1 Purpose of the Environmental Information Document

When public grant and loan program funds administered by the Division are spent on a construction project, the project must be assessed for environmental impacts. The EID allows the Division, as well as other review agencies, to make determinations about the degree of impacts that can reasonably be expected to occur as a result of construction and operation associated with a proposed project. The EID may also be needed to comply with SEPA.

SEPA – State Environmental Policy Act
EID – Environmental information document

Projects seeking funding through the CWSRF, DWSRF, WW-HUC, DW-HUC, WW-SRL, or WW-SEL are subject to SEPA requirements. Even though CWSRF and DWSRF projects are subject to SEPA, there are some federal cross-cutting issues that may be applicable. The two programs are very similar, and environmentally speaking, both have a goal of preserving natural resources and minimizing environmental consequences.

For additional information, refer to EPA's [NEPA](#) Homepage and [associated regulations](#) and DENR's [SEPA](#) Web page and [associated regulations](#).

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7.2 Impact Definition

When constructing a project, three types of impacts must be documented in the EID. These impacts are as follows:

- Direct impacts
- Secondary impacts
- Cumulative impacts

Secondary and cumulative impacts (SCI) are often assessed jointly. This subchapter discusses the different types of impacts, as well as the scope of impacts that must be considered. Environmental impacts can be both positive (hereafter known as benefits) or negative (hereafter known as impacts). The EID should include a discussion of both impacts and benefits. DENR’s [Guidance for Preparing SEPA Documents and Addressing Secondary and Cumulative Impacts](#) is an excellent resource for additional information.

Benefit – A positive effect on the environment

Impact – A negative effect on the environment

SCI – Secondary and cumulative impacts

The following subchapters specifically define the three types of impacts.

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7.2.1 Direct Impacts

Direct impacts are those effects on the environment that occur at the same time and place as the project. They are the most certain and predictable of the impacts.

Direct Impact – Those effects on the environment that occur at the same time and place as the project.

Direct impacts include impacts from construction-related activities as well as impacts related to operation of a newly constructed or modified facility upon completion of construction. The EID must address direct impacts, which are typically the easiest to identify.

Examples of Construction Impacts

- Displacement of wildlife from clearing forests
- Air emissions from construction equipment
- Degradation of aquatic habitat from stream crossings

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7.2.2 Secondary Impacts

Secondary impacts are effects to the environment and natural resources that are more removed in time and distance from a project’s construction and operation activities. Secondary impacts are also called “indirect impacts” and are often thought of as chain reaction processes where one action or result leads to another action or result. SEPA regulations ([15A NCAC 01C .0103](#)) define secondary impacts as

Examples of Operational Impacts

- Air emissions from generators
- Increased nutrient loading in a river due to WWTP discharge
- Noise from a pump station constructed near a neighborhood park

...indirect impacts caused by and resulting from a specific activity that occurs later in time or further removed in distance than direct impacts, but are reasonably foreseeable. Indirect impacts may include growth-inducing effects and other effects related to induced changes in the pattern of land

Secondary impacts – Effects to the environment and natural resources that are more removed in time and distance from a project’s construction and operation activities.

use, population density, or growth rate and related effects on air and water and other natural systems, including ecosystems.

Secondary impacts associated with infrastructure projects are often related to residential, commercial, and industrial growth that the infrastructure project supports.

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7.2.3 Cumulative Impacts

Cumulative impacts are those effects that result from the project's direct impacts when added together with impacts from other past, present, and future projects that can be reasonably predicted. SEPA regulations define cumulative impacts as "environmental impacts resulting from incremental effects of an activity when added to other past, present, and reasonably foreseeable future activities regardless of what entities undertake such actions."

Evaluating cumulative impacts requires analysis of the "big picture" in terms of time and space. In some cases, cumulative impacts may be positive. These are an issue that must be considered any time that growth is anticipated in the project area, even if that growth is not facilitated by or connected to the project. If impacts from a project are minor and limited to construction only, they are less likely to contribute to cumulative impacts in the broader project area. Note that even minor impacts may be significant to a cumulative impacts analysis if those impacts are permanent in nature because minor permanent impacts from multiple projects can become significant when considered together.

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7.2.4 Scope of Impacts

The other factor to consider when evaluating impacts of the project is the scope of impacts. The scope of impacts is the area that should be investigated to identify impacts to various resources that are included in the impact analysis. The scope of impacts for direct impacts is more narrowly focused because it deals with impacts that occur in close proximity to the project. The scope of impacts for SCI is typically

Example of Secondary Impacts

Construction of a residential subdivision as a result of a sewer expansion. The paved roads, driveways, and other impervious surfaces may cause pollutant runoff into nearby streams.

Cumulative impacts – Those effects that result from the project's direct impacts added together with impacts from other past, present, and future projects that can be reasonably predicted.

Cumulative impacts must be considered and discussed for any project that takes place in an area experiencing growth and development, even if the proposed project is not an expansion project.

Example of Negative Cumulative Impacts

Construction of collection system expansion + nearby highway expansion + new subdivision infrastructure = potential degradation of watershed

Example of Positive Cumulative Impacts

Stream and Wetlands restoration at the head of the watershed + Stormwater BMPs constructed for new subdivision + removal of structures from floodplain = potential improvement of water quality in streams.

The scope of impacts will differ by resource category and impact type.

broader and will include areas that will be impacted by future growth and development in areas surrounding the project site. Table B.7.1 below identifies the scope of that should be considered for both direct impacts and SCI for each resource category.

Table B.7.1 Scope of Impacts for Resource Categories		
Resource Category	Direct Impacts	SCI
Topography and Flood Plains	Project site	Existing and expanded service area
Soils	Project site	Existing and expanded service area
Prime and Unique Farmland	Project site	Existing and expanded service area
Land Use	Project site	Existing and expanded service area
Forest Resources	Project site	Existing and expanded service area
Wetlands & Streams	Project site and subbasins/watershed downstream of the project	Subbasin/watershed containing the existing and expanded service area as well as areas downstream
Water Resources	Subbasin/Watershed containing the project and downstream (for surface water) and aquifer below the project (for groundwater)	Subbasin/Watershed containing the project and expanded service area as well as areas downstream (for surface water) and aquifer below the project and expanded service areas (for groundwater)
Shellfish or Fish and Their Habitats	Subbasin/Watershed containing the project and downstream	Subbasin/Watershed containing the existing and expanded service areas
Wildlife and Natural Vegetation	Project site and T&E species adjacent to site	Existing and expanded service area
Public Lands, Scenic & Recreational Areas	Project site and areas immediately adjacent to the project site	Existing and expanded service area
Areas of Archaeological or Historical Value	Project site and areas immediately adjacent to the project site.	Existing and expanded service area
Air Quality	Area immediately adjacent to site and area downwind of the project (area downwind of the project is included for operational impacts, not construction impacts)	Region containing the project site
Noise Levels	Project site and area adjacent to the project (area adjacent to the project is included for operational impacts, not construction impacts)	Existing and expanded service area
Introduction of Toxic Substances	Project site	Not applicable

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7.3 Preparing the Environmental Information Document

The EID must include the existing environmental characteristics, predicted environmental effects, environmental justice (where required), and mitigative measures. Each item that must be included is discussed in further detail below.

Many of the requirements for the EID are based upon the North Carolina Department of Administration's (DOA's) [Environmental Assessment Guidelines](#).

Only State-funded projects require a limited EID.

For minor ERs/EIDs, each table must be completed according to the instructions in the relevant section of the guidance. The guidance document walks through the type of information that should be included within the tables. Note that limited EIDs for state-funded programs only will require select tables. Each section of the guidance will indicate whether that table must be completed for a limited EID, as will the tables provided in a separate document on the [Division's website](#).

For a major ER/EID, a narrative format must be used. Refer to the guidance for the type of information that should be included, but note that a greater level of detail is expected in a major ER/EID. This additional detail is necessary for agency review and for Division staff to be able to prepare the final environmental document. Supporting information should be placed in an appendix of the ER/EID.

For minor ERs/EIDs, and limited EIDs, the tables contain cells for existing conditions, direct impacts, SCI, and mitigative measures.

- For each table, complete all cells. For resource categories where no impacts will occur even if the resources is present, state no impact and provide the reason why. The purple box to the right provides an example.
- If an impact will occur, then provide a mitigative measure that will minimize or mitigate the impact.
- Copy and paste the table from the document provided on the Division's website into the body of the ER/EID.
- Where figures are required, provide the figures either in the body of the ER/EID or an appendix with the appendix appropriately referenced within the table.

Though the project area contains three historic landmarks, no impacts will occur because the replacement of the pipe is located ½ mile from these landmarks.

For the existing conditions cell, describe the immediate project site and surrounding project area as it currently exists. Avoid the following common mistakes:

- Describing only resources that will be impacted by the project
- Describing only the immediate project site
- Putting N/A in the existing conditions cell because there will be no impacts

Project site – the area where the construction of the project will occur

Project area – The vicinity adjacent to the project site. Will vary depending upon the scope of impacts for the resource category.

All resources must be addressed, whether impacted by the project or not. The surrounding project area must be included. Refer to [Table B.7.1](#) for more information on the scope of impacts, which defines the area that must be described.

Note that the area for existing impacts varies by the scope of impacts for the resource category.

The environmental impacts cells for both direct impacts and SCI are the most critical part of the EID. As discussed in [Subchapter 7.2](#) of this part, the EID must address direct impacts, secondary impacts, and cumulative impacts. Address all resource categories as discussed in [Subchapter 7.4](#) of this part. In the discussion for each resource, explain the rationale for conclusions. Consider the scope of impacts as discussed in [Subchapter 7.2.4](#) of this part. For SCI, utilize the guidance discussed in [Subchapter 7.2.2](#) of this part. Refer to [Table B.7.1](#) for additional information on the scope of impacts that should be addressed for each resource category.

Keep in mind that a project can produce both environmental impacts and benefits. The focus of many EIDs tends to be on potentially negative impacts, but benefits should be discussed as well.

Be sure to describe both the impacts and benefits of a project.

Major ERs/EIDs Only

- Complete the EID in a narrative format and use tables where needed to accurately and succinctly present information.

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(Last updated: May 2015)

7.4 Resource Categories

The following subchapters address each resource category for the EID. Please note that the bold italics at the beginning of each subchapter as well as in the tables found in the document on the [Division's website](#) will denote for which funding program the table is required.

(Last updated: May 2015)

7.4.1 Topography and Floodplains

For use for projects funded or co-funded with the CWSRF, WW-HUC, WW-SRL, and WW-SEL programs.

Requirements

- Complete the Table 7.1 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- Prepare a figure that shows the following:
 - The project location
 - The location of the 100-year floodplain and any floodways
 - Major roadways with appropriate labeling

- Waterways with appropriate labeling

Place the figure in the body of the ER/EID or in an appendix with the appropriate reference in the table.

Note: The floodplain features may be included on an Environmental Features Figure that incorporates a variety of resources.

- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.1.1 Existing Conditions

Briefly describe the topography of the project site and project area, including landforms, slopes, and elevations.

Include a brief description of the geology of the area. Note any significant geological features.

Discuss whether the project will encroach on the 100-year floodplain. If the project is within or near the floodplain, note the floodplain areas on the figure. The figure must clearly delineate where the project is located in relation to the floodplain. The North Carolina Emergency Management Agency has [digital floodplain data](#) available for possible use in analysis. Distinguish between floodplain impacts and floodway impacts.

100-year floodplain – The areas that are expected to be inundated by the 1% annual chance flood (100 year flood)

Floodway – The channel of a stream, plus any adjacent floodplain areas, that must be kept free from encroachment so that the 1% annual chance flood can be carried without substantial increase in flood height.

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(Last updated: May 2015)

7.4.1.2 Direct Impacts

For direct construction impacts, describe how the project will change existing topography on the project site. Note whether changes, if any, will be temporary or permanent.

Practicable – Capable of being done within existing constraints.

Identify encroachments of the project on floodplains and floodways. For floodplains, discuss whether the construction of the project will impact the 100-year floodplain. Discuss how any buildings or infrastructure built in the floodplain will be protected.

For projects funded through the CWSRF and DWSRF programs where there are proposed permanent changes to the 100-year floodplain (see [Executive Order 11988](#)), alternatives to the impact must be provided in the alternatives analysis. Impacts to the floodplain are only allowed where there is no practicable alternative. The test of what is practicable depends on the situation and includes consideration of all pertinent factors such as environment, cost, and technology. Clearly explain why alternatives that would not impact the floodplain were rejected.

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(Last updated: May 2015)

7.4.1.3 Secondary and Cumulative Impacts

For SCI, discuss the changes in topography in the existing and expanded service area which will be impacted by the project.

Note if there is a local floodway regulation program in place for the service area. Specify whether any local ordinances restrict building in the floodplain or floodway.

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(Last updated: May 2015)

7.4.1.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances related to restricting development in floodplains and floodways and what those restrictions are. Provide any ordinances on a CD or DVD in an appendix with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.2 Soils

For use with projects funded or co-funded by the CWSRF program and/or for projects requiring a FONSI.

Requirements

- Complete the Table 7.2 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- Prepare a figure that shows the following:
 - The project location
 - The location of the soils series from the [Natural Resources Conservation Service \(NRCS\) soil survey](#) within the project area
 - Major roadways with appropriate labeling
 - Waterways with appropriate labeling

Place the figure in the body of the ER/EID or in an appendix with appropriate reference in the table.

- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.2.1 Existing Conditions

Briefly describe the characteristics of the dominant soil units in the project area. Do not simply list the soil types. Note whether any soil types present a constraint to the project. This would include any fill, wetland soil types, etc. Note any soil contamination that exists. The [North Carolina Center for Geographic Information and Analysis](#) (NCCGIA) has links to digital layers of soils information. The Natural Resources Conservation Service (NRCS) also has large amounts of soils information available.

NCCGIA – North Carolina Center for Geographic Information and Analysis

NRCS – Natural Resources Conservation Service

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(Last updated: May 2015)

7.4.2.2 Direct Impacts

For direct construction impacts, discuss whether the project will involve soil disturbance or contamination. Discuss the extent to which soil will be disturbed. If soil will be moved, identify the location to which it will be moved if known, or discuss contractor responsibilities with regard to moving or disposing of soil. Note whether soil is expected to be contaminated, and describe the contamination if expected. Provide quantitative information (i.e., square feet to be disturbed or cubic yards to be moved) if known, but a qualitative discussion is also acceptable.

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(Last updated: May 2015)

7.4.2.3 Secondary and Cumulative Impacts

For SCI, describe how soils will be impacted in the existing and expanded service area, especially in terms of past, present, and future soil erosion due to the project. For example, if a WWTP were being built that would expand the service area, then the discussion of SCI would need to detail historical soil erosion trends as well as discuss the impacts that the project would have on soil erosion in the future. Discuss any turbidity stream violations that have occurred in the project area.

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(Last updated: May 2015)

7.4.2.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances related any erosion and sedimentation plans and associated permitting.

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(Last updated: May 2015)

7.4.3 Prime or Unique Farmland

For use with projects funded or co-funded by the CWSRF program and/or for projects requiring a FONSI.

Requirements

- Complete the Table 7.3 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- If prime or unique farmlands exist, prepare a figure that shows the following:
 - The project location
 - The location the prime and unique farmland soils series from the [NRCS soil survey](#) within the project area
 - Major roadways with appropriate labeling
 - Waterways with appropriate labeling

Place the figure in the body of the ER/EID or in an appendix with the appropriate reference in the table.

- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

Note: The prime and unique farmland soils may be included on an Environmental Features Figure that incorporates a variety of resources.

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(Last updated: May 2015)

7.4.3.1 Existing Conditions

Note whether the project area includes any lands designated as prime or unique farmland by NRCS. If such lands are located in the area, discuss whether they are currently in agricultural use or other land use. Information from the [NRCS](#) may be helpful.

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(Last updated: May 2015)

7.4.3.2 Direct Impacts

Direct impacts to prime or unique farmland should be evaluated and discussed as follows:

1. Determine whether prime and unique farmland will be directly impacted by the project. If none will be impacted, state as such, and no further analysis is required.
2. Determine whether the land that will be impacted is currently in agricultural use. If not, state as such, and no further analysis is needed. If so, then estimate the acreage of land currently in agricultural use that will be lost from agricultural use or otherwise negatively impacted by the project.

3. Determine the percentage of prime or unique farmland in the county that will be lost from agricultural use or otherwise impacted. Divide the average expected to be impacted as determined in the previous step by the estimated total acreage of prime or unique farmland in the county.
4. If the percentage of impacted land is significant, discuss the implications of that loss.

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(Last updated: May 2015)

7.4.3.3 Secondary and Cumulative Impacts

For SCI, discuss past trends related to prime or unique farmland being taken out of agricultural production. For the future, discuss the impacts of the project on any prime or unique farmland in the existing and expanded service area, especially in terms of land being currently used for agricultural production. If possible, provide a quantitative amount of land currently in agricultural production that will be lost.

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(Last updated: May 2015)

7.4.3.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances related land use restrictions to preserve prime or unique farmlands. Include copies of these ordinances on a CD or DVD within an appendix with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.4 Land Use

For use with projects funded or co-funded by the CWSRF program and/or for projects requiring a FONSI.

Requirements

- Complete the Table 7.4 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- Recommended: Prepare a figure that shows the following:
 - The project location
 - The land use within the project area
 - Major roadways with appropriate labeling
 - Waterways with appropriate labeling

Place the figure in the body of the ER/EID or in an appendix with the appropriate reference in the table.

Figures that show zoning, future land use, and future zoning may also be prepared in accordance with the requirements above.

- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.4.1 Existing Conditions

Describe the current use of land at the project site and in the project area. Discuss how the current land use of the project site fits into the land use of the region in terms of conservation development and ecological function.

Provide the current zoning classification of the project site if applicable. For the figures mentioned above, consult with the county or Applicant's planning department for further information.

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(Last updated: May 2015)

7.4.4.2 Direct Impacts

For direct construction and operational impacts, discuss how land use on the project site will change and how the new use fits into the intended land use of the entire area in terms of conservation, development, ecological function, and quality of life. Identify whether local zoning or land use plans need to be changed.

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(Last updated: May 2015)

7.4.4.3 Secondary and Cumulative Impacts

For SCI, explain how land use in the existing and expanded service area is expected to change as a result of the project. Discuss whether new uses fit the intended land use of the entire area in terms of conservation, development, ecological function, and quality of life. Note whether local zoning or land use patterns will be changed in the existing and expanded service area of the project.

Secondary and cumulative impacts often come into play with projects that are driven by growth.

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(Last updated: May 2015)

7.4.4.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances related land use development. Refer to any land use plans or zoning ordinances as necessary. Include copies of these ordinances on a CD or DVD within an appendix with appropriate reference made in the table.

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7.4.5 Forest Resources

For use with projects funded or co-funded by the CWSRF program and/or for projects requiring a FONSI.

- Complete the Table 7.5 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.5.1 Existing Conditions

Describe the type of forest resources (e.g., pines, hardwoods, mixed) on the project site and in the project area. Discuss whether the forest resources are old growth or new growth.

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(Last updated: May 2015)

7.4.5.2 Direct Impacts

Describe any direct construction impacts to forest resources as a result of project construction. If a forested area will be cleared, specify the acreage that will be cleared and describe the forestry practices to be used.

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(Last updated: May 2015)

7.4.5.3 Secondary and Cumulative Impacts

For SCI, describe past trends related to the loss of forest resources as well as expected future trends. If possible, approximate the amount of forestry acreage that might be lost due to the project in the existing and expanded service area.

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(Last updated: May 2015)

7.4.5.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances related forest preservation. Include copies of these ordinances on a CD or DVD within an appendix with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.6 Wetlands and Streams

For use with projects funded by CWSRF, WW-HUC, WW-SRL, and WW-SEL programs.

Requirements

- Complete Tables 7.6.1 and 7.6.2 (if needed) and place them in the body of the ER/EID. The subchapters below discuss what the tables should contain.
- Prepare a figure that shows the following:
 - The project location
 - Wetlands and streams within the project area with appropriate labeling
 - Major roadways with appropriate labeling
 - Stream and wetland crossings (if any) keyed to Table 7.6.2

Note: The wetlands and streams mapping may be included on an Environmental Features Figure that incorporates a variety of resources.

Place the figure in the body of the ER/EID or in an appendix with appropriate reference made in the table.

- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.6.1 Existing Conditions

Note whether any federally or state-regulated wetlands are present within the project area or on the project site. Identify when any delineations occurred, if applicable. Discuss the type, quality, function (e.g., flood control, wildlife habitat, groundwater recharge), and relative importance of wetlands in the project area to the total wetland resources of the larger area.

NWI – National Wetlands Inventory

FWS – U.S. Fish and Wildlife Service

Identify and discuss any streams in the project area and on the project site (if applicable).

[NCOneMap](#) has a digital layer of the National Wetland Inventory (NWI) maps available for download, as does the [U.S. Fish and Wildlife Service](#) (FWS).

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(Last updated: May 2015)

7.4.6.2 Direct Impacts

For direct construction impacts, discuss the impacts to wetlands and streams as a result of project construction. For operational impacts, discuss the impacts to wetlands and streams due to long-term operation of the project. If a wetland will be filled as part of the project, indicate how many acres are involved and note the location of the fill on the figure. For impacts to streams, note the stream length in linear feet that will be affected. Discuss all stream crossings, including crossing methods used, as applicable. Crossings that will have no or minimal impact such as direct bore must be included.

For projects that involve collection systems or reclaimed water distribution lines, provide the following information in a table for each crossing:

- The stream/wetland crossing identified by a number and keyed to the map
- The diameter and type of line that will be installed
- The installation method
- The acreage (wetlands) and linear feet (streams) impacted
- Total the impacts at the bottom of the table

For direct operational impacts, discuss whether the operation of the project will have any impacts or benefits on subbasins or watersheds downstream of the project. For example, expanding a WWTP might remove a discharge upstream of an impaired stream, which would improve the quality of a stream not in the vicinity of the project by reducing the nutrient loading.

For projects funded through the CWSRF and DWSRF programs where there are proposed permanent impacts to wetlands (see Executive Order 11990), alternatives to the impacts must be provided in the alternatives analysis. Describe how impacts to wetlands have been avoided and minimized, and discuss why alternatives that would have lesser impacts to wetlands have been rejected.

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(Last updated: May 2015)

7.4.6.3 Secondary and Cumulative Impacts

For SCI, consider the long-term impacts to wetlands and streams that may result from diversion from, discharge to, or withdrawal from surface waters upstream of any wetland areas. Additionally, discuss past trends related to the loss/gain of wetlands and streams in the subbasin(s) or watershed(s) for the existing and expanded service area. Describe any potential losses or gains in the future as a result of the project. If possible, provide an estimate of the wetlands that may be gained or lost.

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(Last Updated: May 2015)

7.4.6.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances related the protection of wetlands and streams. Include copies of these ordinances on a CD or DVD within an appendix with appropriate reference made in the table. If any permits from the U.S. Army Corps of Engineers (USACE) or the state are required, then provide a listing of these permits.

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7.4.7 Water Resources

For use with projects funded or co-funded by the CWSRF or DWSRF and/or for projects requiring a FONSI.

Requirements

- Complete the Table 7.7 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- Prepare a figure that shows the following:
 - The project location
 - Streams within the project area with appropriate labeling
 - Major roadways with appropriate labeling

Note: The stream mapping may be included on an Environmental Features Figure that incorporates a variety of resources.

Place the figure in the body of the ER/EID or in an appendix with the appropriate reference in the table.

- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.7.1 Existing Conditions

Discuss surface water and groundwater resources in the project area and surface waters downstream. For surface waters, include the name, classification, and use support ratings. Also identify the river basin where the project is located. If there are unnamed streams in the project area, briefly describe

them and use the classification of the closest downstream classified stream. The [Division of Water Resources](#) (DWR) has information that is helpful for this subchapter.

For groundwater, discuss the use, quantity, quality, depth, and recharge of groundwater resources in the project area, and identify the primary aquifer(s) in the project area. Specifically discuss any capacity use areas in the project area.

Identify the primary source(s) for drinking water in the project area.

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(Last updated: May 2015)

7.4.7.2 Direct Impacts

Describe the direct construction impacts to surface waters in the subbasin/watershed containing the project and downstream of the project in terms of water quality and quantity and whether there is the potential for stormwater runoff increases due to an increase in the amount of impervious surfaces. Identify the amount of impervious surface increase, if any.

Discuss any construction impacts to groundwater quality and quantity.

Also, characterize the direct, long-term operational impacts of the project. Be sure to consider issues such as increased sedimentation and stormwater runoff as well as impacts to surface water and groundwater quality and quantity. For example, a stormwater project might create erosion concerns while it is being built, but once constructed, it would reduce the amount of turbidity in a nearby stream.

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(Last updated: May 2015)

7.4.7.3 Secondary and Cumulative Impacts

For SCI, consider changes to water quality within the subbasin/watershed containing the project and the expanded service area, including impacts on erosion rates, sedimentation, and eutrophication. Note past and future trends related to water quality and stormwater runoff (e.g., increase in impervious surfaces). If possible, estimate the expected percentage of impervious surface area increase or decrease in the project area.

For example, constructing a collection system to take failing septic systems offline could cause potential adverse construction impacts related to erosion and sedimentation entering nearby waterways. However, the operational benefits would reduce the amount of fecal coliform entering nearby surface waters. For SCI, the new collection system could fuel growth within the service area, meaning that the subbasin/watershed containing the current and expanded service area could experience an increase in impervious surfaces area and stormwater runoff due to growth.

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(Last updated: May 2015)

7.4.7.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances and any erosion and sedimentation plans and associated permitting. Include any ordinances on a CD/DVD in an appendix to the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.8 Wild and Scenic Rivers

For use with projects funded or co-funded by the CWSRF program and/or for projects requiring a FONSI.

Requirements

- Complete the Table 7.8 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- Include any supporting information in an appendix to the EID. List the appendix reference in the table.

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(Last updated: May 2015)

7.4.8.1 Existing Conditions

Utilize the website for [National Wild and Scenic Rivers System](#) to determine if any wild and scenic rivers are located in the project area.

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(Last updated: May 2015)

7.4.8.2 Impacts and Mitigation

If there are designated Wild and Scenic Rivers within one mile of the project site, describe any construction and operational impacts. If impacts are anticipated, consult with the U.S. Fish and Wildlife Service to determine if mitigation is required. Discuss any mitigation that will be implemented as determined by the U.S. Fish and Wildlife Service.

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(Last updated: May 2015)

7.4.9 Coastal Resources

For use with projects funded or co-funded by the CWSRF or DWSRF and/or for projects requiring a FONSI.

Requirements

- Complete Table 7.9 in and place in the body of the EID.
- Place any supporting information in an appendix of the EID. List the appendix reference in the table.

This table documents compliance with the Coastal Zone Management Act (CZMA) and Coastal Barrier Resources Act and Coastal Zone Management Act. Its format is a different from the other resource category tables.

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(Last updated: May 2015)

7.4.9.1 Coastal Area Management Act

Funded projects must demonstrate compliance with the Coastal Area Management Act (CAMA), which is administered through the Division of Coastal Management (DCM). First, determine whether the project is located in a CAMA county. If the project is located in a CAMA county and involves new construction, land conversion, major rehabilitation, or substantial improvement activities, then a consistency review is required. Refer to DCM's [Federal Consistency Review](#) webpage for additional information regarding consistency review. Discuss the consistency review in the table and include any correspondence with DCM in an appendix.

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(Last updated: May 2015)

7.4.9.2 Coastal Barrier Resources Act

Under the Coastal Barriers Resources Act/Coastal Barrier Resource Improvement Act of 1990, certain communities are designated as Coastal Barrier Resources Systems (CBRS). The Act is intended to minimize loss of human life, wasteful expenditure of revenues, and damage to natural resources associated with barrier islands by restricting financial assistance for projects that encourage development of coastal barriers. If the project is located within a coastal county, determine if the project is located in a CBRS. The FWS has a [CBRS Mapper](#) available online to determine if a project is located in a CBRS community. If the project is located in CBRS community, Federal assistance is only allowed for certain exempted activities (e.g., a nature trail)

The format of Table 7.9 is different from the other resource category tables.

CZMA – Coastal Zone Management Act

CAMA – Coastal Area Management Act

DCM – Division of Coastal Management

CAMA Counties:

Beaufort, Bertie, Brunswick, Camden, Carteret, Chowan, Craven, Currituck, Dare, Gates, Hertford, Hyde, New Hanover, Onslow, Pamlico, Pasquotank, Pender, Perquimans, Tyrrell, Washington

CBRS – Coastal Barrier Resources Systems

FWS – U.S. Fish and Wildlife Service

after approval from the FWS (see 16 USC 3505 for exceptions to limitations on expenditures). A record project approval from the FWS must be provided; otherwise Federal funds cannot be used for the project.

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7.4.10 Shellfish, Fish, and Their Habitats (Including Aquatic T&E Species)

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, and WW-SEL programs.

Requirements

- Complete Table 7.10 and place it within the body of the ER/EID.
- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.10.1 Existing Conditions

Discuss whether there are any categories of shellfish beds and/or fish habitats at or near the project site and in the project area. Provide examples of specific species present. Note whether there are closed beds, highly productive areas, or spawning areas in the text. Include such areas on the Environmental Features Figure.

Note whether any aquatic threatened and endangered (T&E) species or identified habitats for T&E species are in or near the project area, particularly downstream of the project site. T&E species are a critical issue during review of the EID. Be sure to review both Federal and state T&E species lists. If T&E species are present, include a detailed discussion of the species present, their status, and their approximate locations. T&E species may be available through [NCOneMap](#), which is part of the [NCCGIA](#). Additionally, both the [FWS](#) and the [North Carolina Natural Heritage Program](#) (NHP) have data available related to T&E species. Typically, T&E species locations should be identified within a two-mile radius.

T&E – Threatened and endangered

NCCGIA – North Carolina Center for Geographic Information Analysis

NHP – North Carolina Natural Heritage Program

The existing conditions description applies to all shellfish, fish, and their habitats, not just T&E species.

Note that the existing conditions description applies to all shellfish, fish, and their habitats, not just to T&E species.

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(Last updated: May 2015)

7.4.10.2 Direct Impacts

Describe any construction impacts to shellfish, fish, and their habitats in the subbasin/watershed containing the project and downstream of the project. Additionally, characterize the operational impacts for this same area.

If there might be T&E species impacts, contact NHP as soon as possible. They may advise contact with the FWS if federally protected species are involved.

If T&E species are present within or downstream of the project area, be sure that the discussion clearly explains how impacts to such species will be minimized or avoided. If no impacts are anticipated, clearly support that position. If impacts are anticipated or possible, the Division highly recommends that the [NHP](#) be contacted as soon as possible. They may advise that the FWS be contacted as well if federally protected species are involved.

Specifically note any impacts to T&E species.

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(Last updated: May 2015)

7.4.10.3 Secondary and Cumulative Impacts

For SCI, discuss past trends related to fish, shellfish, and their habitats and then characterize potential future impacts.

For example, if the proposed project discussed in [Subchapter 7.4.7.3](#) of this part were constructed, then the erosion and sedimentation from the project could negatively impact fish, shellfish, and their habitat downstream. However, the project would result in operational benefits because of an improvement of their habitats downstream. The SCI from the project could adversely impact fish, shellfish, and their habitats in waterbodies within the subbasin/watershed(s) containing the project and expanded service area.

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(Last updated: May 2015)

7.4.10.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances and any erosion and sedimentation plans and associated permitting. Include any ordinances on a CD/DVD in an appendix to the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.11 Wildlife and Natural Vegetation (Including Terrestrial T&E Species)

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, and WW-SEL programs.

Requirements

- Complete Table 7.11 and place it within the body of the ER/EID.
- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.11.1 Existing Conditions

Identify wildlife habitat that exists on the project site or in the project area. List specific species of dominant plants and animals that are indicative of the kind of habitat present.

The existing conditions description applies to all wildlife and natural vegetation, not just T&E species.

Note whether terrestrial T&E species and/or their habitats are located at or near the project site. T&E species are a critical issue during review of the EID. Be sure to review both federal and state T&E species lists. If T&E species are present, include a detailed discussion of the species present and their locations. T&E species may be available through [NCOneMap](#), which is part of the [NCCGIA](#). Additionally, both the [FWS](#) and the [NHP](#) have data available related to T&E species. Typically, T&E species locations can be identified within a two-mile radius.

Note that the existing conditions description applies to all wildlife and vegetation, not just T&E species.

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(Last updated: May 2015)

7.4.11.2 Direct Impacts

Describe the construction impacts to wildlife and natural vegetation. Quantify in acres the amount of natural vegetation that will be disturbed or destroyed by the project, and note whether such impacts will be short term or permanent. Note whether wildlife will be displaced, either temporarily or permanently, and identify surrounding areas or areas nearby that may provide similar habitat for relocation.

If there might be T&E species impacts, contact NHP as soon as possible. They may advise contact with the FWS if federally protected species are involved.

Specifically note any impacts to T&E species.

If T&E species are present within the project area, be sure that the discussion clearly explains how impacts to such species will be minimized or avoided. If no impacts are anticipated, clearly support that position. If impacts are anticipated or possible, the Division highly recommends that

the [NHP](#) be contacted as soon as possible. They may advise that the FWS be contacted as well if federally protected species are involved.

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(Last updated: May 2015)

7.4.11.3 Secondary and Cumulative Impacts

For SCI, discuss past trends related to wildlife and natural vegetation within the existing and expanded service area. Then discuss future trends. If possible, provide an estimate of the potential loss of wildlife habitat.

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(Last updated: May 2015)

7.4.11.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances related T&E species and associated permitting. Include any ordinances on a CD/DVD in an appendix to the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.12 Public Lands and Scenic, Recreational, and State Natural Areas

For use with projects funded or co-funded by the CWSRF program and/or for projects requiring a FONSI.

Requirements

- Complete Table 7.12 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- Prepare a figure that shows the following:
 - The project location
 - The location of any scenic, recreational, or state natural areas keyed to the table
 - Major roadways with appropriate labeling
 - Waterbodies with appropriate labeling

Note: These resources may be included on an Environmental Features Figure that incorporates a variety of resources.

Place the figure in the body of the ER/EID or in an appendix with appropriate reference in the table.

- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.12.1 Existing Conditions

Describe any formally designated parkland, scenic, recreational, or state natural areas that are located within two miles of the project site or that are located outside of that radius but will be potentially impacted by the project. [NCOneMap](#) has some of this information available digitally.

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(Last updated: May 2015)

7.4.12.2 Direct Impacts

Discuss whether the project will impact formally designated parkland, scenic, recreational, or state natural areas on or adjacent to the project site due to the construction and operation of the project. Quantify any expected losses or areas of impaired use and discuss the significance of such losses or impairments. Also, discuss the loss of any informal scenic or recreational functions.

A project might consist of a pump station, force main, and collection system constructed next to a baseball field to take failing septic systems offline. Direct construction impacts to the baseball field might consist of inaccessibility and safety issues as well as noise and exhaust from construction vehicles. Operational impacts could include odor from the pump station and noise from the emergency generator usage and testing.

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(Last updated: May 2015)

7.4.12.3 Secondary and Cumulative Impacts

For SCI, discuss past trends of impacts to public lands and scenic, recreational, and state natural areas within the existing and expanded service area. Characterize potential future trends as well.

For the baseball field example, SCI would consist of development related to the collection system upstream of the pump station, which could create growth all around the baseball field.

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(Last updated: May 2015)

7.4.12.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances. Include any ordinances on a CD/DVD in an appendix to the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.13 Areas of Archaeological or Historical Value

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, and WW-SEL programs.

Requirements

- Complete the Table 7.13 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- Prepare a figure that shows the following:
 - The project location
 - The location of any historic resources keyed to the table¹⁹
 - Major roadways with appropriate labeling
 - Waterbodies with appropriate labeling

Note: These resources may be included on an Environmental Features Figure that incorporates a variety of resources.

Place the figure in the body of the ER/EID or in an appendix with the appropriate reference in the table.

- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.13.1 Existing Conditions

Identify and discuss any archaeological sites or historical resources that may potentially be impacted by the project. Identify any historic buildings located on the project site and their approximate age. Note any resources within the project area. Consult with the Department of Cultural Resources' State Historic Preservation Office (SHPO) for assistance. The SHPO will provide project review through mail or e-mail. Note that the SHPO will not release the precise location of archaeological resources to avoid looting of these resources.

SHPO – State Historic Preservation Office

The SHPO will not release the precise location of archaeological resources to avoid looting of these resources.

Include references to studies regarding archaeological or historical resources as applicable. If no studies are available, discuss if and how the site has been previously disturbed. Include correspondence with the SHPO and/or any agencies consulted for this review.

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¹⁹ The location of archaeological sites are confidential to avoid looting.

(Last updated: May 2015)

7.4.13.2 Direct Impacts

Discuss the construction impacts of the project on areas of archaeological or historical value on the project site or within a radius specified by the SHPO. Generally, this radius should be within a quarter mile of the project site unless otherwise specified by the SHPO. State whether any historic building will be destroyed or disturbed and, if so, note the location of such buildings on the Environmental Features Figure. Include photographs of the relevant buildings on the site.

For operational impacts, discuss if any areas adjacent to the project site contain archaeological or historical resources. If they do, then describe the potential impacts.

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(Last updated: May 2015)

7.4.13.3 Secondary and Cumulative Impacts

For SCI, consider the existing and expanded service area. Describe past trends related to the loss/gain of archaeological or historical resources and detail what may occur in the future.

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(Last updated: May 2015)

7.4.13.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances. Include any ordinances on a CD/DVD in an appendix to the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.14 Air Quality

For use with projects funded or co-funded by the CWSRF program and/or for projects requiring a FONSI.

Requirements

- Complete the Table 7.14 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.

A pump station, force main, and collection system may be constructed with the pump station being at the edge of a cemetery. Direct construction impacts will occur in terms of construction noise and exhaust being generated. Operation could impact the cemetery if visitors had to listen to emergency generators and equipment testing or could smell any odors.

For the cemetery example above, SCI would occur if historic buildings and cemeteries were removed to accommodate growth in the future service area.

- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated; May 2015)

7.4.14.1 Existing Conditions

Discuss the ambient air quality and nonattainment areas and identify current sources of emissions from the project site and project area. The [EPA](#) and DENR's [Division of Air Quality](#) (DAQ) provide information related to air quality issues within the state.

DAQ – Division of Air Quality
EPA – U.S. Environmental Protection Agency

Discuss any previous odor problems or complaints due to existing facilities.

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(Last updated: May 2015)

7.4.14.2 Direct Impacts

Discuss any expected direct construction or operational impacts to air quality at and around the project site. Note whether impacts are related to construction or related to operational impacts.

Construction impacts can be emissions from construction equipment or smoke from open burning.

Discuss whether open burning will occur. If it will, describe what will be burned.

Operational impacts can be emissions that occur during generator testing and/or usage.

Consider whether general air quality degradation will occur as a direct construction impact.

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(Last updated: May 2015)

7.4.14.3 Secondary and Cumulative Impacts

For SCI, characterize any potential air quality degradation in the region containing the project. Discuss any past air quality trends and how SCI will affect future trends.

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(Last updated: May 2015)

7.4.14.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances. Discuss any permits that may be required. Include any ordinances on a CD/DVD in an appendix to the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.15 Noise Levels

For use with projects funded or co-funded by the CWSRF program and/or for projects requiring a FONSI.

Requirements

- Complete the Table 7.15 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.15.1 Existing Conditions

Discuss the current noise levels on the project site with examples of sources of noise on the project site or in the project rea. Include measureable benchmarks, if possible. Briefly discuss any local noise ordinances that are in place for the project area.

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(Last updated: May 2015)

7.4.15.2 Direct Impacts

Discuss whether noise levels are expected to change at or near the project site as a result of construction or operation of the project. If noise levels are expected to increase, discuss when the impacts will occur and the distance at which the increased noise will be heard. Discuss whether surrounding properties will be affected by noise levels.

Construction impacts may include noise from construction equipment.

Operational impacts may include noise from generators, blowers, and other machinery once the project is in operation.

For example, construction of a pump station and force main would cause construction noise. Once the project is operational, operational impacts could come from emergency generator testing and usage.

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(Last updated: May 2015)

7.4.15.3 Secondary and Cumulative Impacts

For SCI, characterize past trends related to noise in the existing and expanded service area. This can be a qualitative discussion related to land use changes over time that impact noise and should identify any specific developments that have had significant impact on noise levels. Then analyze potential future trends.

For the pump station and force main example, noise related to SCI would occur as the pump station and force main facilitated growth in the existing and expanded service area.

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(Last updated: May 2015)

7.4.15.4 Mitigative Measures

If there are no impacts, state N/A for mitigative measures. If there are any impacts, then briefly discuss any mitigative measures that may be in place, including ordinances. Discuss any permits that may be required. Include any ordinances on a CD/DVD in an appendix to the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.16 Introduction of Toxic Substances

For use with projects funded or co-funded by the CWSRF program and/or for projects requiring a FONSI.

Requirements

- Complete the Table 7.16 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

For this resource category, only direct construction impacts need to be considered. Discuss the potential for the introduction of toxic substances. Be sure to consider that most construction activities have the potential to introduce toxic substances such as fuels, lubricants, etc. into the environment.

Note that most construction activities have the potential to introduce toxic substances related to construction equipment (fuels, lubricants, etc.).

Chemicals used in the wastewater (for wastewater projects) or water (for water projects only) treatment processes must be included in this discussion. Describe the type and extent of contamination that may reasonably be expected and the mitigative measures that will be implemented.

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(Last updated: May 2015)

7.4.17 Environmental Justice

For use with projects funded or co-funded by the CWSRF program.

[Executive Order 12898](#) states that

Each federal agency shall conduct its programs, policies, and activities that substantially affect human health or the environment, in a manner that ensures that such programs, policies, and activities do not have the effect of excluding persons (including populations) the benefits of, or subjecting persons (including populations) to discrimination under such programs, policies, and activities, because of their race, color, or national origin.

EPA's Office of Environmental Justice is responsible for implementing Executive Order 12898 as it applies to EPA actions and programs. Environmental justice (EJ) strives to ensure that no racial, ethnic, or socioeconomic group bears a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. Environmental justice also includes giving all persons equal access to the decision-making process. As federally funded programs, the CWSRF and DWSRF programs are subject to policies established by the Office of Environmental Justice.

In terms of preparing an EID, an EJ analysis must be conducted to verify that EJ is achieved through the project. Consult [EPA's guidance](#) for additional information.

Requirements

- Complete the Table 7.17 and place it in the body of the ER/EID. The subchapters below discuss what the table should contain.
- If using the EJ View Tool, provide a copy of the maps in the body of the ER/EID that contains the following:
 - The project location with all components clearly marked. Note that you will need to include separate maps to illustrate percentage of minority populations and percentage below poverty level.
 - The location of all minority and low-income populations.

Place the figure in the body of the ER/EID or in an appendix and check the appropriate box in the table.

Include any supporting information in an appendix of the ER/EID with appropriate reference made in the table.

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(Last updated: May 2015)

7.4.17.1 Existing Environmental Justice Characteristics

The first step of the EJ analysis involves determining the presence of a significant minority or low-income population. EPA's [EJ View](#) can help identify minority and/or low-income populations in and near the project area. The tool will generate maps that can be printed and included with the EID to document this step of the analysis.²⁰ If another source of data is used to identify minority or low-income populations in the project area, document the process used. All maps must clearly show the project site. An alternative process may be used by following the steps below. Note that the most current American Community Survey (ACS) data must be used.

If there are anticipate EJ populations within the project area, the Division encourages Applicants to conduct public participation in these areas.

ACS – American Community Survey

1. Census Block Groups and Census Tracts. Determine what Census block group(s) or tract(s) encompass the project area.
2. Collect minority and total population data using the [ACS](#) (can be done with GIS).²¹
3. Minority percentages. Calculate the total minority percentages in each block group. Fifty percent or greater shows a potential impact.
4. Low-income. Repeat for the low-income population using data for percent below poverty rate.

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(Last updated: May 2015)

7.4.17.2 Potential Impacts from Project

If the analysis of Census block groups and tracts discussed above indicates that minority and/or low-income populations are greater than 50 percent of the total population at or near the project site, then proceed with determining what impacts the project will have on the identified minority and/or low-income population(s). Environmental justice issue may involve impacts to human health or related social or economic impacts. If minority and/or low-income populations are identified in the project area, consider, for each resource category related to human impacts, whether such populations will be disproportionately affected. Describe the anticipated impacts as well as measures that will be taken to minimize the potential for harmful impacts. Be sure to include any efforts to ensure adequate opportunities for public participation. If significant impacts are anticipated, contact the Environmental Review Coordinator as soon as possible to discuss.

Analysis of EJ impacts should focus on impacts to the human environment such as noise and air.

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²⁰ The EJ View replaces the older EnviroMapper tool.

²¹ Note that as of 2010, EPA stopped tracking a lot of data associated with financial information to the block group level. Use tract data for percent of population below the poverty line.

7.4.18 Mitigative Measures

For use with projects funded or co-funded by the CWSRF, WW-HUC, WW-SRL, and WW-SEL programs.

Requirements

- Complete Table 7.18 and place it in the body of the ER/EID.
- Per Subchapters 7.1 through 7.17 of this part, make sure that copies of any permits already obtained, ordinances, or other mitigative measure documentation are found in appendices of the ER/EID with appropriate reference made in the table. Ordinances may be placed on a CD/DVD.

For any potential impacts identified in the sections above, discuss mitigative measures. These may include actions specifically taken or actions deliberately avoided or limited in order to minimize impacts. Mitigative measures may also include actions taken to repair or compensate for damage done. Some specific examples of mitigative measures that might be applicable to a project include the following:

- Adhering to the requirements of a sedimentation and erosion control permit
- Conducting construction activities during daytime hours only to minimize impacts from noise on residential areas
- Constructing wetland habitats in a nearby area to replace wetlands that are filled
- Maintaining buffers that exceed regulatory requirements
- Installing an air pollution control device to minimize odors

Use the table to clearly identify the potential impact(s) and associated mitigative measure(s). Include all resource categories in the table. If additional explanation is needed, include a text discussion in addition to the table. Quantify impacts whenever possible. If no impacts have been identified, indicate “none” for impacts and “not applicable” for mitigative measures.

Major ERs/EIDs Only

- Provide the summary table as discussed above.
- Provide a narrative discussion for mitigative measures for each resource category for which impacts have been identified. If desired, the mitigative measures can be discussed as a subsection of each resource category section.

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8.0 Financial Analysis

The financial analysis portion of the ER/EID describes how the project will be funded. Moreover, if the applicant is seeking a loan for the project, it provides ways to calculate how the loan may be repaid.

The tables used in the financial analysis for infrastructure will vary depending upon the type of funding, which is indicated in bold italics throughout this subchapter.

This subchapter will be broken out into different steps. The bold show which funding programs should use what steps. For questions, please contact the Project Manager.

Infrastructure projects consist of the following broad types:

- Wastewater treatment plants
- Wastewater collection systems

Requirements

If the project is a minor ER/EID, use the workbook found on the [Division's website](#) called WW-DW_Financial_Analysis. The Introduction worksheet contains directions on how to complete each portion of the workbook. The subchapters below discuss each step in more detail.

Major ERs/EIDs Only

- Calculations for the financial analysis may be used, or the [workbook](#) provided by the Division may be used. If using calculations, then provide both a justification for the different methodology and sample calculation so that Division staff can replicate them.
- Any alternative methodologies used to calculate the financial impacts must fulfill the requirements as set forth in this subchapter.

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(Last updated: May 2015)

8.1 Determination of Rates to Median Household Income Percentage

For use with projects funded or co-funded by the CWSRF, WW-SRL, and WW-SEL programs.

The rate to median household income (MHI) is given as a percentage and provides an indication of how much of a user's MHI goes toward paying water and sewer utility fees. If the project is a loan, then paying back the loan will impact an individual's rate to MHI.

If using units of measurement other than \$/1,000 gallons (e.g., scfm), then convert to \$/1,000 gallons before continuing with this analysis.

To determine the rate to MHI, utilize the information provided in the application package to the Division. Any units of measurement that are different than thousands of gallons should be converted (e.g., \$/100 gallons needs to be converted to \$/1,000 gallons). Any conversions required should be added to the Additional Information cell of the table. Enter into the Applicant Condition sheet of the workbook the rate structure (uniform vs. other) by using the pulldown menus supplied.

MHI – Median household income

If the rate structure is uniform, then there should be a base charge and a volumetric charge. For the base charge, enter the rate of the base charge and the amount of water considered to be the base charge (e.g., 2,000 gallons may be part of the base charge). Then enter the volumetric charge per thousands of gallons. Do the same for water rates if the water rates are volumetric.

If the rate structure is something other than uniform, then enter the amount per thousand gallons into the volumetric charge.

Enter the annual MHI for the Applicant.

The worksheet will calculate the rate per thousand gallons for both sewer and water.

If the rate to MHI figure for the combined utility bill is greater than four percent (or two percent for a single utility bill), then discuss why the figure is above four percent. Qualitatively discuss how each alternative, including the No-Action Alternative, considered would impact a user's rate to MHI value. The purple box to the right provides an example.

The \$/MHI rate of the Town of Anytown is 4.10%. This is because the Town has an I/I problem in its downtown area that has resulted in the WWTP treating more flow than is in the system. Doing nothing would only increase the I/I problem. Pure rehabilitation is not feasible while pure replacement would result in higher costs than the Preferred Alternative, which would increase rates even more.

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8.2 Determination of Funding Sources

For use with projects funded or co-funded by the CWSRF, WW-SRL, WW-SEL, WW-HUC, and CDBG-I funding programs.

Another part of the financial analysis is to look at the different funding sources for the project. Not only does this consider the funding sources offered by the Division, but it should also take into account other funding sources the Applicant might use such as local funds or bonds. Use Table 8.2 in the [workbook](#) to enter all funding sources as described below.²²

Any principal forgiveness under the CWSRF program should be listed in the Main Division Funding row.

For the Funding Source column, use the pulldown menu to select the appropriate funding source(s). Note that the CWSRF program has four different types of funding that may be utilized: principal forgiveness, zero percent, base rate, and Green Project Reserve (GPR). If the Applicant qualifies for principal forgiveness, list it as the main source of funding. Then add the rest of the CWSRF or DWSRF funding and any other funding sources to the rows below.

²² Note that for projects using only grants, this table may be Table 7.1. To change the table number, go to the Review tab and unlock both the workbook and the worksheet. There is no password associated with the workbook or worksheets.

Add the amounts for each funding source into the second column. The worksheet will automatically calculate the total funded amount.

Any loans from outside the Division (e.g., USDA Rural Development loan) should be listed as a loan on this table.

In the third column, specify the funding type. If the funding source is a loan, including any exterior loans, add the interest rate. For loans from the Division, the Letter of Intent to Fund (LOIF) will contain the interest rate for the project. Then add the repayment period for any loans, either from the Division or outside sources. Note that for Division loans, the maximum repayment period for loans is 20 years unless otherwise specified as a lesser amount.²³

LOIF – Letter of Intent to Fund

Last, list the closing costs or administrative fees associated with the loan or the grant. For CWSRF, the closing fee is two percent and cannot be included in the loan amount. For WW-SRL, and WW-SEL loans, the closing fee is two percent and *may* be included in the loan amount. For WW-HUC grants, the administrative fee is 1.5 percent of the total award and may be paid separately or deducted from the grant award. For the CDBG-I grants, there is no administrative fee issued to recipients. Based upon the type of award, the worksheet will adjust the total project cost.

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8.3 Determination of Loan Repayment Output

For use with projects funded or co-funded by the CWSRF, WW-SRL, WW-SEL programs.

Once the funding sources have been determined, if there are any sources that are loans, either from the Division or outside the Division, then determine any principal and interest that will need to be repaid, which can impact user fees. The Division reviews only Year 1 because that is the year when the interest payment will be at its highest.

If completing a minor ER/EID, then the [workbook](#) will complete the calculation. Print this table and include it in the body of the ER/EID.

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8.4 Determination of User Fee Increase

For use with projects funded or co-funded by the CWSRF, WW-SRL, WW-SEL programs.

After determining the annual repayment for principal and interest, determine how the project only will impact user fees. This portion of the analysis examines the following:

²³ State law limits maximum loan terms to 20 years.

- The change in user rates to accommodate any loans on the entire user base (residential and non-residential) at the specified interest rate. This part of the analysis examines how loans would typically impact the user base of the Applicant.
- The change in user rates to accommodate any loans on the residential user base at the specified interest rate. This part of the analysis examines how loans would impact the Applicant if all commercial and industrial users left the area.

To determine impacts on user fees, enter into the workbook the number of residential and non-residential (e.g., commercial, institutional, industrial) connections. Then enter the average water usage per user per month for each customer type. The workbook will calculate the total monthly water usage for the customer base as well as the number of 5,000-gallon units in the customer base. Also, from the present worth analysis, enter the total O&M costs for Year 1 only. This is because the Year 1 Annual Repayment calculated in the previous step and the Year 1 Total O&M cost added together will impact the user fees for Year 1.

Customer type – Residential and non-residential customers who have water accounts within the Applicant’s service area.

O&M – Operations and maintenance

The [workbook](#) will then calculate the monthly costs per 5,000 gallons of water used on both the total customer base and residential customers only. Print this table and include it in the body of the ER/EID.

Use the Year 1 total O&M expenses from the present worth calculations as the Year 1 O&M in the workbook.

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8.5 Determination of Impacts to User Rates

For use with projects funded or co-funded by the CWSRF, WW-SRL, WW-SEL programs.

Once the increase to user rates related to the project has been determined, calculate the impact to the current user rates. For minor ERs/EIDs, the [workbook](#) will calculate the impacts. Print this table and include it in the body of the ER/EID.

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(Last updated: May 2015)

8.6 Determination of Impacts to Utility Bill per Median Household Income

For use with projects funded or co-funded by the CWSRF, WW-SRL, and WW-SEL programs.

Once the new user rates have been calculated, determine the impact to the utility bill as a percentage of MHI. For minor ERs/EIDs, the workbook will calculate this new value. If the result is a combined new rate to MHI of greater than four percent or a single new rate to MHI of

greater than two percent, then explain in the gray box of the table how the Applicant will minimize the financial impact of the project on its users.

The Division recognizes that many utilities may have rate structures and models that accommodate rate increases ahead of time to pay for projects or have other methods of paying for projects that may not be reflected in this analysis. If this is the case, then use the second gray box in the table to discuss project financing.

Complete the table, print it, and place it in the body of the ER/EID.

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[To Public Participation](#)

(Last updated: May 2015)

9.0 Public Participation

For use with projects funded or co-funded with the CWSRF, WW-HUC, WW-SRL, WW-SEL, and/or CDBG-I programs.

Public participation plays a vital role in the development of a project because it requires that the Applicant keep its citizens informed of projects that may impact them not only via user charges but also impacts to their water or sewer service. Maintaining contact with citizens also reduces the risk of court action later and can fulfill the requirements of SEPA or NEPA.

The following subchapters discuss the process to use to determine the level of public involvement and what is required for public involvement.

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(Last updated: May 2015)

9.1 Level of Public Involvement

The Division requires differing levels of public involvement that depends upon the type of environmental document your project will need as well as the type of project. [Figure B.9.1](#) provides a flowchart related to determining the level of public involvement.

First, examine the type of Division funding used for the project. If the project is funded or co-funded with CDBG-I funds, then the public participation process will be handled by the Responsible Entity via the environmental documentation process.

If the project is funded or co-funded with CDBG-I funds, then the Responsible Entity will complete the public participation requirements via the environmental documentation process.

Next, look at the type of environmental document that the project will require. If the project requires an EIS, then contact the Environmental Review Coordinator to determine the level of public involvement required. If the project requires a FONSI regardless of funding program, then complete all of the public meeting requirements that are discussed in [Subchapter 9.2](#) below.

Responsible Entity – The unit of general local government legally responsible for the environmental review of the project.

Third, examine project type. If the project is a wastewater treatment plant expansion, water treatment expansion, collection system expansion, or transmission and distribution system expansion, then you will need to look at your future flows.

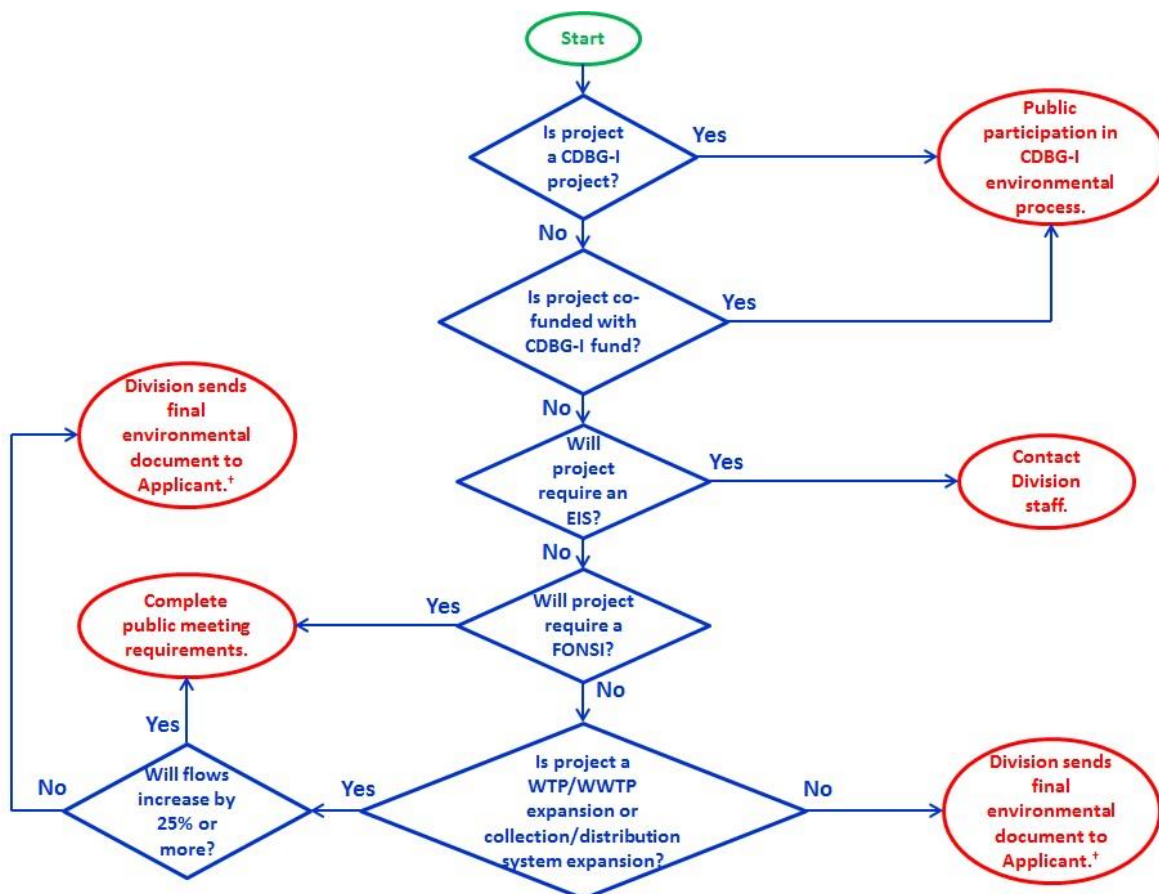
Last, if the future flows will increase by twenty-five percent or greater, then you will need to complete all of the public involvement requirements discussed in [Subchapter 9.2](#) regardless of the type of final environmental document for the project. The Division requires public participation for this large amount of increase in flow because such a large increase is most likely related to growth, and the public needs to understand how their user rates will be impacted to finance this growth.

If the project trips none of these triggers, then the Division will prepare the final environmental document and send it to the Applicant for their files.²⁴ Though not required, the Division also recommends that the Applicant place a copy of this on their website to keep citizens informed of the project. Additionally, the Division encourages other public involvement such as focus groups and additional public meetings if the scope of the project is large enough to have an impact on many people.

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(Last updated: May 2015)



†For WW-SRL, WW-SEL, and WW-HUC programs, no final environmental document is issued.

(Last updated: May 2015)

Figure B.9.1. Flow Diagram for Level of Public Involvement Required

²⁴ If the project is funded only through the WW-HUC, WW-SRL, or WW-SEL programs, then no final environmental document will be prepared.

9.2 Public Meeting Requirements

As discussed above, two levels of public involvement may occur. The first level is a low level of involvement. The second level of public involvement has more stringent requirements that must be completed before the Division can approve the document. The subsections below discuss these requirements. Use the flowchart in [Figure B.9.1](#) to determine the level of public involvement for the project.

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(Last updated: May 2015)

9.2.1 Low Level of Public Involvement

For most projects, such as CEs for projects funded through the CWSRF program, the level of public involvement remains minimal. The Division will prepare a CE and send it to the Applicant as part of the approval package for the Applicant's files. The Division also recommends that the Applicant post a copy of the CE on its website and that the Applicant keep its citizens informed through whatever means are best.

CE – Categorical Exclusion

If the project is funded through the WW-SRL, WW-SEL, or WW-HUC programs only, then the Division will not send a CE, as there are no environmental clearances required. Instead, the Division recommends that the Applicant keep its citizens informed through whatever means are best.

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9.2.2 High Level of Public Involvement

The Division requires more public involvement if a project requires a FONSI as a final environmental document or if the project is an expansion project that will increase flows by 25 percent or greater. The following steps describe how to complete the public involvement process. While the Division encourages public involvement throughout the development of a project, this specific process will not occur until Division staff have completed their reviews and resolved all technical and environmental issues. Note that the public involvement discussed below must occur before any FONSI can be sent to the SCH.²⁵

The public involvement process discussed below must occur before a FONSI can be sent to the SCH.

FONSI – Finding of No Significant Impact

SCH – State Clearinghouse

²⁵ For projects funded through the WW-SRL, WW-SEL, or WW-HUC that are expansion projects with flow increases of 25 percent or greater, this process must occur before the project can be approved.

1. Advertise the public meeting.

Provide a two-week notification by advertising it in a local newspaper whose coverage encompasses the project area. The Division recommends utilizing other means such as advertising such as the Applicant's website. The advertisement must contain the following information:

- The time and location of the public meeting
- When and where a copy of the ER/EID can be reviewed
- A brief description of the proposed project
- The project cost, the amount of funding required, and the source(s) of funding.

Note that due to the project's schedule with the Division, FONSI preparation is on a tight timeline and that the Applicant and Division must work closely together to ensure that public involvement is completed in a timely manner.

Upon advertisement, make a copy of the ER/EID available for review at least two weeks prior to the public meeting. Consider placing it at an accessible location such as the Applicant's main offices or the public library.

Once advertisement is complete, attain a copy of the affidavit of publication and the advertisement itself, as the Applicant will need to submit this once the public meeting has occurred.

2. Hold the public meeting.

The Applicant has two options for the public meeting. It may hold it as part of a regularly scheduled council meeting or as a separate event. At this meeting, present the following information:

- An identification of the need and purpose of the project (e.g., the problem)
- A discussion of the alternatives considered, including the No-Action Alternative and the Preferred Alternative.
- An identification of the funding utilized and the amount(s) of funding sought
- Any required interlocal agreements
- The impact of the project on the monthly water or sewer bill for a typical residential user of 5,000 gallons per month (infrastructure projects only)
- How the loan will be repaid (green projects only)

When discussing changes to water or sewer rates, be specific by showing the rates before the project, the rates after the project, and the percent change.

The Applicant may also present other relevant information such as benefits of other grants, interest rate benefit of Division programs, regulatory requirements, etc. The Division requires that the Applicant prepare a handout or slides of the presentation, as this must be submitted (see below).

3. Report on the public meeting.

Once you have completed the public meeting, send the following to the Environmental Review Coordinator:

- A copy of the affidavit of publication

The Division does not require a certified court reporter's transcript unless that is the typical procedure for the Applicant.

- A copy of the advertisement
- A copy of any presentation made (e.g., PowerPoint slides or handouts)
- Minutes or a detailed summary of the meeting.

The Applicant may e-mail this information to the Environmental Review Coordinator, who will use this information to draft the FONSI. The summary may be either meeting minutes or a certified copy of the meeting transcript. However, the Division does not require a court reporter's certified transcript unless that is the Applicant's typical procedure.

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(Last updated: May 2015)

Appendix A

Minor Construction Activities

15A NCAC 01C .0408 MINOR CONSTRUCTION ACTIVITIES

This Rule sets out the general and specific minimum criteria for construction activities. Construction and land disturbing activities must fall under both the general minimum criteria and any specific minimum criteria applicable to the project.

(1) General criteria. The following categories of land disturbing activity do not require preparation of an environmental document.

(a) In the 20 coastal counties, land disturbing activity that:

(i) is located more than 575 feet away from waters classified as High Quality Waters (HQW) or impacts less than five acres located all or in part within 575 feet of waters classified as High Quality Waters (HQW);

(ii) is located outside of any Outstanding Resource Waters (ORW) watershed or area that requires specific management actions to protect ORW waters as defined in 15A NCAC 02B .0225; and

(iii) impacts less than five acres located in any Outstanding Resource Waters (ORW) watershed or in any area that requires specific management actions to protect ORW waters as defined in 15A NCAC 02B .0225.

(b) Land disturbing activity outside the twenty coastal counties that:

(i) is located more than one mile from waters classified as HQW or impacts less than five acres located within one mile of and draining to waters classified as HQW;

(ii) is located outside of any Outstanding Resource Waters (ORW) watershed or area that requires specific management actions to protect ORW waters as defined in 15A NCAC 02B .0225;

(iii) impacts less than five acres located in any Outstanding Resource Waters (ORW) watershed or in any area that requires specific management actions to protect ORW waters as defined in 15A NCAC 02B .0225; and

(iv) is located more than 25 feet from any waters classified as Trout (Tr) waters or impacts less than five acres located all or in part within 25 feet of any waters classified as Trout (Tr) waters.

(c) Channel disturbance and land disturbing activities associated with non-compensatory stream restoration or stream enhancement.

(d) Land disturbing activities impacting wetlands if the activity will result in the loss of one acre or less of Class WL wetlands.

(e) Land disturbing activities impacting streams if the activity will result in channel disturbance of less than 500 linear feet of perennial streams. Land disturbing activities that impact 500 linear feet or more of perennial streams do not require preparation of an environmental document if stream restoration or stream enhancement is performed.

(2) Specific Criteria. Construction or expansion activities listed below require an environmental document if they exceed either the minimum criteria set out in Item (1) of this Rule or the thresholds established below.

- (a) The following activities related to wastewater treatment systems.
 - (i) Relocation of discharge points within the same river basin;
 - (ii) New discharge facilities with a proposed permitted expansion of less than 500,000 gallons per day and producing an instream waste concentration of less than 33 percent during the 7-day 10-year low flow conditions;
 - (iii) Expansion of an existing discharge facility of less than 500,000 gallons per day additional flow;
 - (iv) New surface irrigation, high rate infiltration, or subsurface waste water systems with a proposed permitted capacity not exceeding 100,000 gallons per day;
 - (v) Reclaimed water utilization systems with reclaimed water utilization being the sole disposal option with a proposed permitted capacity not exceeding 200,000 gallons per day;
 - (vi) New reclaimed water utilization sites with a proposed permitted capacity not to exceed 500,000 gallons per day when the reclaimed water utilization system is required for compliance with any other wastewater disposal permit;
 - (vii) New reclaimed water utilization sites with a proposed permitted capacity not to exceed 1,000,000 gallons per day when the reclaimed water utilization system is not required for compliance with any other wastewater disposal permit;
 - (viii) New reclaimed water utilization distribution lines;
 - (ix) New permits or modification to existing permits for land application of residuals utilization, where less than 10 acres not previously permitted is prior converted within three years or will be converted from a non-plantation forested area to application area;
 - (x) New or expanding surface disposal sites disposing less than 3000 dry tons of residuals per year;

- (xi) Gravity sewer extensions with less than three miles of new lines or lines of less than 18 inches in diameter; and
 - (xii) New or expanding individual pump stations and associated force mains with a proposed permitted capacity of less than 1750 gallons per minute.
- (b) The following activities related to potable water systems.
- (i) Improvements to water treatment plants that involve less than 1,000,000 gallons per day added capacity and total design withdrawal less than one-fifth of the 7-day, 10-year low flow of the contributing stream;
 - (ii) Improvements not intended to add capacity to the facility;
 - (iii) Installation of appurtenances in existing rights-of-way for streets or utilities, or water lines and appurtenances less than five miles in length and having only directional bore stream crossings or no stream crossings; and
 - (iv) Construction of water tanks, or booster pumping or secondary or remote disinfection stations.
- (c) Groundwater withdrawals of less than 1,000,000 gallons per day where such withdrawals are not expected to cause alterations in established land use patterns, or degradation of groundwater or surface water quality.
- (d) The following activities related to solid waste disposal:
- (i) Construction of solid waste management facilities, other than landfills exempt pursuant to G.S. 130A-294 (a)(4), which store, treat, process incinerate, or dispose of less than 350 tons per day (averaged over one year) of solid waste; and
 - (ii) Disposal of solid waste by land application on 100 total acres or less, where less than 10 percent of the total land application area is converted from a non-plantation forested area.
- (e) Development requiring a Coastal Area Management Act (CAMA) permit or State Dredge and Fill Law permit that does not involve:
- (i) Construction of a new marina, or a 25% or greater expansion in the number of slips at existing and operating marinas;
 - (ii) Excavation of a new navigation channel. Maintenance activities associated with maintaining the traditional and established use of a channel and new excavation activities located entirely within 100 feet of the shoreline, or within 50 feet from the waterward edge of any existing or authorized docking facility and involving the

excavation of less than 5,000 square feet of public trust bottom do not constitute excavation of a new navigation channel for purposes of these rules.

(iii) Excavation of materials from aquatic environments for use for beach nourishment or other purposes not directly related to approved navigation projects;

(iv) A large scale beach nourishment or spoil deposition project. A project shall be considered large scale when it places more than a total volume of 200,000 cubic yards of sand at an average ratio of more than 50 cubic yards of sand per linear foot of shoreline;

(v) The salvaging of cut logs from public trust waters for commercial use, unless the salvage operation complies with any departmentally-approved best management practices developed for such activities;

(vi) The construction over state owned submerged lands of private bridges to privately owned islands, unless the length of the bridge is less than 50 feet; and

(vii) The excavation, dredging or other hydrodynamic manipulation of an inlet, inlet channel(s) or inlet shoal(s) for non-navigational purposes.

(f) Construction of a minor source or modification of a minor source of air emissions as defined in 15A NCAC 02D .0530, that are less than 100 tons per year or 250 tons per year as defined therein.

(g) Construction relating to the reclamation of underground storage tanks and restoration of groundwater quality.

(h) The construction, repair or removal of dams less than 25 feet in height and having less than 50 acre-feet of effective storage capacity.

(i) Any new construction for a building which involves all of the following;

(i) A footprint of less than 10,000 square feet;

(ii) A location that is not a National Register Archaeological site; and

(iii) The building's purpose is not for storage of hazardous waste.

(j) Demolition of or additions, rehabilitation or renovations to a structure not listed in the National Register of Historic places or less than 50 years of age.

(k) Routine grounds construction and landscaping of sidewalks, trails, walls, gates and related facilities, including outdoor exhibits.

(l) Installation of on-farm Best Management Practices that meet the standards of the North Carolina Soil and Water Conservation Commission and the federal Natural Resources Conservation Service.

(m) Construction or remodeling of swimming pools.

(n) Construction of a new two-lane road in accordance with DOT accepted design practices and DOT standards and specifications involving less than a total of 25 cumulative acres of ground surface limited to a single project, and not contiguous to any other project making use of this provision.

(o) Expansion of a two-lane road in accordance with DOT accepted design practices and DOT standards and specifications involving less than a total of 10 cumulative acres of ground surface limited to a single project, and not contiguous to any other project making use of this provision.

History Note: Authority G.S. 113A-4; 113A-6; 113A-9; 113A-10; 113A-11; 113A-12; 143B-10;

Eff. April 1, 2003.

Appendix B

Submittal Checklist

Submittal Checklist for Engineering Reports/Environmental Information Documents				
(Last updated: June 2015)				
<i>This checklist must accompany the initial submittal of all Engineering Reports/Environmental Information Documents. If your submittal does not contain this checklist, the Project Manager will not start review until it is received.</i>				
A. Number of Reports Submitted				
Number of Copies Submitted: <input type="checkbox"/> 2 copies <input type="checkbox"/> 19 copies (FONSI only) <input type="checkbox"/> Other:				
B. Contact Information				
Owner Information				
Is the contact person (Elected Official or Authorized Representative) different from the application? <input type="checkbox"/> Yes <input type="checkbox"/> No				
If Yes, complete the information below. If No, Continue to Consultant Information				
First Name	Last Name	Suffix	Position	<input type="checkbox"/> Elected Official <input type="checkbox"/> Authorized Representative
Mailing Address 1		Mailing Address 2		City
				State
				Zip Code
E-Mail Address			Phone Number	Extension (if applicable)
Consultant Information				
Is the contact person different from the application? <input type="checkbox"/> Yes <input type="checkbox"/> No				
If Yes, complete the information below. If No, continue to Environmental Information Document Contact Information.				
Firm Name		First Name	Last Name	
			Suffix	
Mailing Address 1		Mailing Address 2		City
				State
				Zip Code
E-Mail Address			Phone Number	Extension (if applicable)
Environmental Information Document Contact Information				
Did a separate firm prepare the Environmental Information Document? <input type="checkbox"/> Yes <input type="checkbox"/> No				
If Yes, complete the information below. If No, then continue to Part C (Project Information).				
Firm Name		First Name	Last Name	
			Suffix	
Mailing Address 1		Mailing Address 2		City
				State
				Zip Code
E-Mail Address			Phone Number	Extension (if applicable)
C. Project Information				
<i>Check all that apply in terms of project type. Note that for the CDBG-I program, projects in both wastewater and water may be checked.</i>				
<input type="checkbox"/> Wastewater Treatment Plant Equipment Repair and Replacement		<input type="checkbox"/> Water Treatment Plant Equipment Repair and Replacement		
<input type="checkbox"/> Wastewater Treatment Plant Expansion		<input type="checkbox"/> Water Treatment Plant Expansion		

<input type="checkbox"/> Collection System Rehabilitation and Replacement	<input type="checkbox"/> Water Line Rehabilitation and Replacement
<input type="checkbox"/> Collection System Expansion	<input type="checkbox"/> Water Storage Repair/Replacement/Expansion
<input type="checkbox"/> Reclaimed Water	<input type="checkbox"/> Water Source Development
<input type="checkbox"/> Stormwater Best Management Practices	
<input type="checkbox"/> Stream/Buffer/Wetland Restoration	
<input type="checkbox"/> Rainwater Harvesting	

D. Environmental Information	
<i>Check the box for the appropriate final information document required for the project and based upon the minor construction activities listed in Appendix A of the guidance (CWSRF, DWSRF, SRL, SEL, and HUC only), and any discussion with Division staff. Note: Under the CDBG-I program, the Responsible Entity will be in charge of the environmental review process. The Consultant should check which environmental document the Responsible Entity is preparing.</i>	
Final Environmental Document	
<input type="checkbox"/> Certificate of Exemption (CDBG-I only) <input type="checkbox"/> Categorical Exclusion Subject to §58.5 (CDBG-I only) <input type="checkbox"/> Categorical Exclusion (CWSRF and DWSRF only) <input type="checkbox"/> Approval Only (SEL, SRL, HUC)	<input type="checkbox"/> Categorical Exclusion Not Subject to §58.5 (CDBG-I only) <input type="checkbox"/> Finding of No Significant Impact (all funding programs) <input type="checkbox"/> Record of Decision (all funding programs)
<i>Check the box(es) for the river basin(s) where the project is found. This information is used for programmatic reporting purposes.</i>	
<input type="checkbox"/> Broad <input type="checkbox"/> Cape Fear <input type="checkbox"/> Catawba <input type="checkbox"/> Chowan <input type="checkbox"/> French Broad <input type="checkbox"/> Hiwassee <input type="checkbox"/> Little Tennessee <input type="checkbox"/> Lumber <input type="checkbox"/> Neuse	<input type="checkbox"/> New <input type="checkbox"/> Pasquotank <input type="checkbox"/> Roanoke <input type="checkbox"/> Savannah <input type="checkbox"/> Tar-Pamlico <input type="checkbox"/> Watauga <input type="checkbox"/> White Oak <input type="checkbox"/> Yadkin

E. Funding Information			
Estimated Project Cost			
Provide the estimated Project Cost:			
Funding Source(s)			
Check the box(es) for each source of funding, including those outside of the Division. Place the amount(s) in the appropriate column.			
<input type="checkbox"/> CWSRF – Base Program <input type="checkbox"/> CWSRF – 0% <input type="checkbox"/> CWSRF – Principal Forgiveness <input type="checkbox"/> CWSRF – Green Project Reserve <input type="checkbox"/> DWSRF – Base Program <input type="checkbox"/> DWSRF – 0% <input type="checkbox"/> DWSRF – Principal Forgiveness <input type="checkbox"/> CDBG-I	\$ \$ \$ \$ \$ \$ \$ \$ \$	<input type="checkbox"/> WW-HUC <input type="checkbox"/> DW-HUC <input type="checkbox"/> North Carolina Rural Center <input type="checkbox"/> USDA Grant/Loan <input type="checkbox"/> Bonds <input type="checkbox"/> Local Funds <input type="checkbox"/> Bank Loans <input type="checkbox"/> Other, Specify:	\$ \$ \$ \$ \$ \$ \$ \$ \$

F. Signature
This submittal checklist has been completed and is, to the best of my knowledge, accurate.
Signature:
Date: