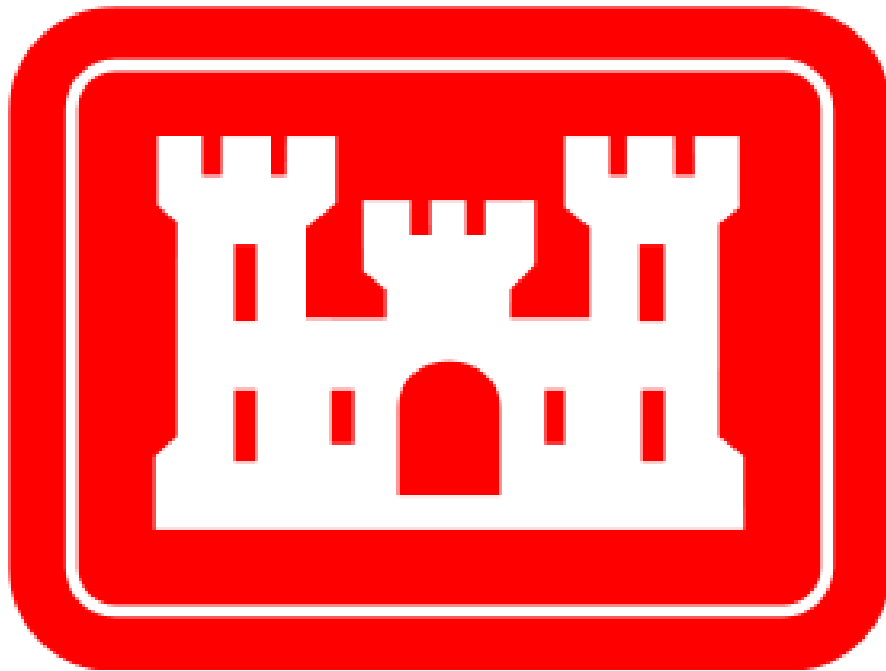


Environmental Assessment
Section 571 St. Marys
Water System Improvements Project
Pleasants County, West Virginia



U.S. Army Corps of Engineers
Huntington District
Huntington, West Virginia
March 2026



Environmental Assessment
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Executive Summary

The City of St. Marys (City) is proposing to improve its water system in Pleasants County, West Virginia. The project is necessary to provide adequate water services to the residents, businesses, and public authorities.

The PAA would consist of water system improvements at five (5) locations. This would include replacement of approximately 330 linear feet (LF) of water main along Barron Street (Site 1), 1,503 LF of waterline along Morgan Avenue (Site 2), and abandonment of the reservoir, vaults, and existing piping at the refinery tank (Site 2). At Site 2, the reservoir would be filled with soil and reseeded. In addition, the PAA would include relocation of the fire hydrant at the intersection of North Pleasants Highway (Route 2) and Wellington Drive (Site 3), installation of two (2) inserta-valves adjacent to Route 2 (Site 4), replacement of four (4) fire hydrants at Mound Manor Road (Site 4), and replacement of a 15-inch culvert along Harmony Heights Way, including the addition of two (2) new inlets (Site 5). This would require removal and replacement of the existing roadway at Site 5. A guardrail would be installed at the bottom of the slope due to the steep grade, and benching would be required for slope stabilization as the new roadway is constructed.

The proposed project is being conducted pursuant to a partnership agreement between the City and the U.S. Army Corps of Engineers (Corps), established under the authority of Section 571 of the Water Resources and Development Act (WRDA) of 1999 (Public Law 106-53), as amended, which provides authority for the Corps to establish a program to provide environmental assistance to non-Federal entities in West Virginia. This law authorizes design and construction assistance for water-related environmental infrastructure projects to non-Federal interests in West Virginia. Funding, as established under Section 571, shall be shared 75% Federal and 25% non-Federal (State and Local).

This Environmental Assessment (EA) was prepared pursuant to the National Environmental Policy Act (NEPA), (42 United States Code [USC] § 4321 et seq.), Department of Defense (DoD) NEPA Implementing Procedures, and the Fiscal Responsibility Act (42 USC § 4331 et seq.).



SECTION 571 ST. MARYS
WATER SYSTEM IMPROVEMENTS PROJECT
PLEASANTS COUNTY, WEST VIRGINIA

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The majority of data collection and analysis in this document was performed by Burgess & Niple, Inc. with the U.S. Army Corps of Engineers. In addition, this document is consistent with the Fiscal Responsibility Act (42 USC § 4336a(e)(2)) with the Environmental Assessment (EA) not exceeding 75 pages, not including citations or appendices.

1.0 PROJECT DESCRIPTION

1.1 Project Background

The City of St. Marys (City or non-Federal Sponsor) is in Pleasants County, West Virginia. The City currently provides water service to 954 residential customers, 109 commercial customers, two (2) industrial customers, and 27 public authority customers. The City recently identified deteriorated water infrastructure along Barron Street (Site 1), Morgan Avenue (Site 2), North Pleasants Highway (Route 2) (Site 3), Mound Manor Road and Bryan Drive (Site 4), and Harmony Heights Way (Site 5).

1.2 Purpose, Need, and Authorization

The purpose of the proposed improvements is to provide adequate water services to residents, businesses, and public authorities that rely on the City's water infrastructure. The proposed improvements are needed to address deteriorating water infrastructure. In addition, the proposed improvements would provide emergency water services to residents and businesses within the project area. Areas of concern and current conditions of the sites are shown in Table 1 below.

Table 1 – Areas of Concern and Current Conditions

Site Name	Area of Concern	Current Conditions
Site 1	Water mains along Barron St	Existing water main along Site 1 is outdated and in need of replacement.
Site 2	Waterline along Morgan Ave	Waterline along Site 2 is deteriorated and will become unserviceable without improvement.
Site 2	Refinery tank system located 0.2 miles south of Morgan Ave	The refinery tank system at Site 2 is no longer in service and is beyond repair.
Site 3	Fire hydrant at the intersection of North Pleasants Hwy (Rt 2) and Wellington Dr	The fire hydrant located at Site 3 is in poor condition, and its proximity to the road makes repairs difficult.
Site 4	Fire hydrants along Mound Manor Rd and Bryan Dr	Defects have been identified in four (4) fire hydrants at Site 4
Site 4	Water infrastructure adjacent to Rt 2	At Site 4, existing water infrastructure consists of a continuous loop that has deteriorated. Should a leak



		occur at Site 4, the City would be unable to shut the water off to perform repairs.
Site 5	Water main along Harmony Heights Way	Water main along Site 5 is at risk of damage due to impairments along Harmony Heights Way. Currently, the road is shifting due to poor soil conditions, thin pavement, and drainage deficiencies, and if the road were to collapse, the water main would be damaged and unable to provide water services.

The proposed project is pursuant to a partnership agreement between the City and the Corps, established under the authority of Section 571 of the Water Resources and Development Act (WRDA) of 1999 (Public Law 106-53), as amended, which authorizes the Corps to establish a program to provide environmental assistance to non-Federal entities in West Virginia. This law provides design and construction assistance for water-related environmental infrastructure projects to non-Federal interests in West Virginia. Funding, as established under Section 571, shall be shared 75% Federal and 25% non-Federal (State and Local).

This EA was prepared pursuant to the National Environmental Policy Act (NEPA), (42 United States Code [USC] § 4321 et seq.), Department of Defense (DoD) NEPA Implementing Procedures, and the Fiscal Responsibility Act (42 USC § 4331 et seq.).

2.0 PROPOSED ACTION AND ALTERNATIVES

2.1 Proposed Action Alternative (PAA)

The PAA would consist of water system improvements at five (5) locations. This would include replacement of approximately 330 linear feet (LF) of water main along Barron Street (Site 1), 1,503 LF of waterline along Morgan Avenue (Site 2), and abandonment of the reservoir, vaults, and existing piping at the refinery tank (Site 2). At Site 2, the reservoir would be filled with soil and reseeded. In addition, the PAA would include relocation of the fire hydrant at the intersection of North Pleasants Highway (Route 2) and Wellington Drive (Site 3), installation of two (2) inserta-valves adjacent to Route 2 (Site 4), replacement of four (4) fire hydrants at Mound Manor Road (Site 4), and replacement of a 15-inch culvert along Harmony Heights Way, including the addition of two (2) new inlets (Site 5). This would require removal and replacement of the existing roadway at Site 5. A guardrail would be installed at the bottom of the slope due to the steep grade, and benching would be required for slope stabilization as the new roadway is constructed.

2.2 No Action Alternative (NAA)

Under the NAA, the Corps would not provide funding for the project and the City would not improve its water system. The system would continue to deteriorate and become unserviceable. As a result, residents and businesses would eventually lose access to public water services. Although the NAA is not considered a viable alternative, the NAA is still included in the



alternatives analysis to establish a baseline condition for existing human and natural environmental conditions, to allow comparison between the future without and with project actions, and to determine potential environmental effects of proposed with project alternatives.

3.0 ENVIRONMENTAL SETTING AND CONSEQUENCES

This section discusses the existing conditions by resource category and any potential environmental impacts associated with the NAA, as well as with implementation of the PAA.

The Corps took context and intensity into consideration in determining potential impact significance. The intensity of a potential impact is the impact's severity and includes consideration of beneficial and adverse effects, the level of controversy associated with a project's impacts on human health, whether the action establishes a precedent for future actions with significant effects, the level of uncertainty about project impacts and whether the action threatens to violate federal, state, or local laws established for the protection of the human and natural environment. The severity of an environmental impact is characterized as none/negligible, minor, moderate, or significant, and may be adverse or beneficial. The impact may also be short-term or long-term in nature.

- None/negligible – No measurable impacts are expected to occur.
- Minor – A measurable effect to a resource. A slight impact that may not be readily obvious and is within accepted levels for permitting, continued resource sustainability, or human use. Impacts should be avoided and minimized if possible but should not result in a mitigation requirement.
- Moderate – A measurable effect to a resource. An intermediate impact that may or may not be readily obvious but is within accepted levels for permitting, continued resource sustainability, or human use. Impacts may or may not result in the need for mitigation.
- Significant – A measurable effect to a resource. A major impact that is readily obvious and is not within accepted levels for permitting, continued resource sustainability, or human use. Impacts likely result in the need for mitigation.
- Adverse – A measurable and negative effect to a resource. May be minor to major, resulting in reduced conditions, sustainability, or viability of the resource.
- Beneficial – A measurable and positive effect to a resource. May be minor to major, resulting in improved conditions, sustainability, or viability of the resource.
- Short-Term – Temporary in nature and does not result in a permanent long-term beneficial or adverse effect to a resource. For example, temporary construction-related effects (such as, an increase in dust, noise, traffic congestion) that no longer occur once construction is complete. May be minor, significant, adverse, or beneficial in nature.



- Long-Term – Permanent (or for most of the project life) beneficial or adverse effects to a resource. For example, permanent conversion of a wetland to a parking lot. May be minor, significant, adverse, or beneficial in nature.

The Corps used quantitative and qualitative analyses, as appropriate, to determine the level of potential impact from proposed alternatives. Based on the results of the analyses, this EA identifies whether a particular potential impact would be adverse or beneficial, and to what extent.

3.1 Project Location

The project area includes five (5) sites in St. Marys, Pleasants County, West Virginia. Site 1 is located along Barron Street, Site 2 is located along Morgan Avenue, Site 3 is located along Route 2, Site 4 is located at Mound Manor Road and Bryan Drive, and Site 5 is located along Harmony Heights Way. Figure 1 below shows the overall project location (See Appendix A for more maps).

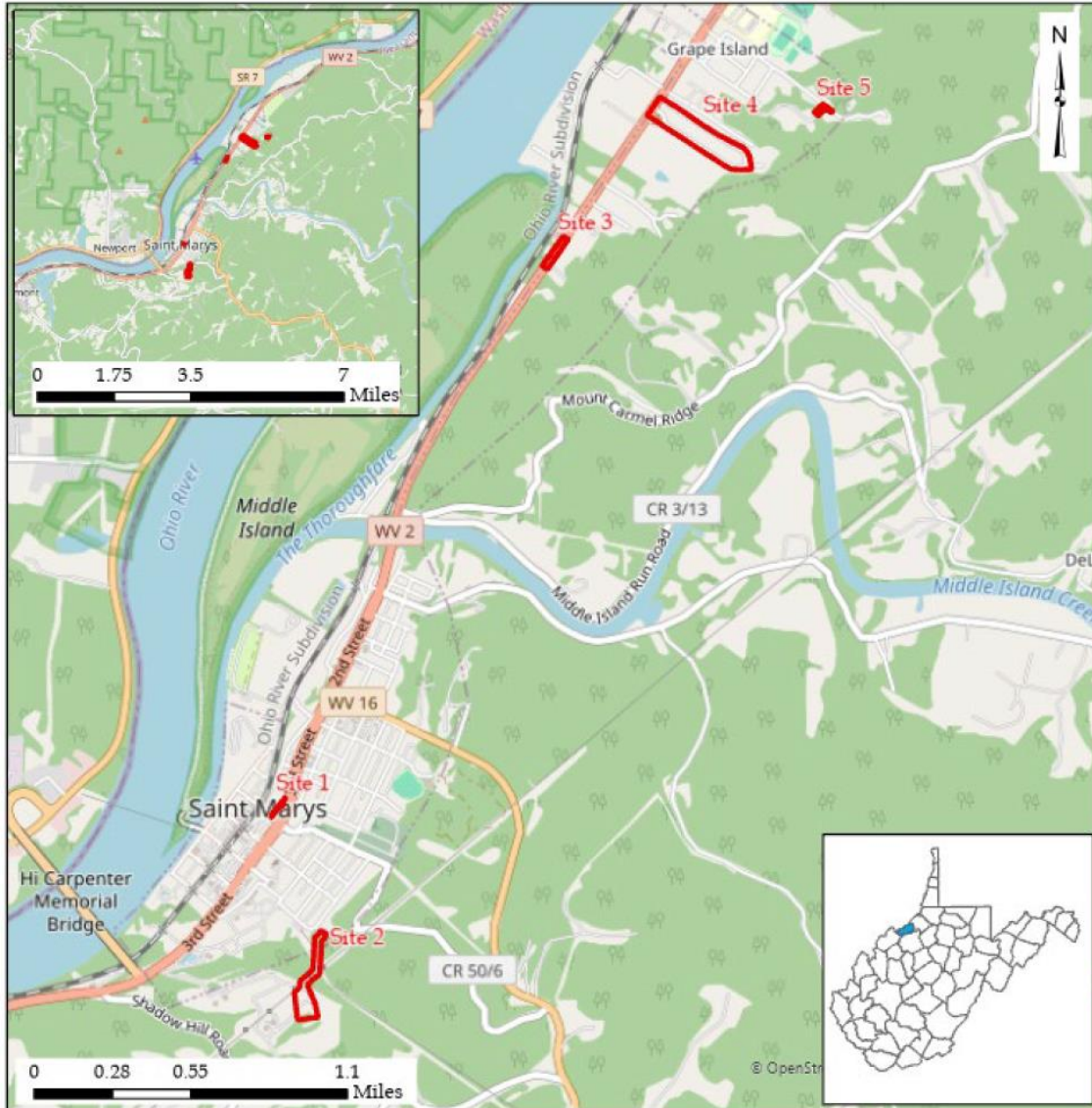


Figure 1: Project Location

3.2 Land Use

Land use varies among the sites listed above. All sites consist of regularly maintained rights-of-way and/or mowed lawns. In addition, portions of Sites 2 and 5 are forested. There would be no change in land use at Site 1, 3, or 4. Sites 2 and 5 would require some tree removal, and these areas would remain permanently cleared. The total disturbance for these five (5) sites is approximately one (1) acre. Impacts to land use would be temporary for Sites 1, 3, and 4 as they would be restored to their pre-existing conditions upon completion. Impacts to land use would be minor in nature at Sites 2 and 5 due to tree removal. Therefore, the PAA would have no significant impacts on land use.



As selection of the NAA would entail no changes to the project area, there would be no impacts to land use as a result of the NAA.

3.3 Climate

The project area is adjacent to the Ohio River located in Pleasants County, West Virginia. The average annual high and low temperatures for the region are 85° F and 21° F, respectively, with July being the hottest and January being the coldest months. The annual precipitation for the area is 43 inches for rain and 23 inches for snow.

The project area is located within the Leith Run-Ohio River watershed (HUC 050302011007) which is part of the greater Ohio River Basin (ORB). Although the modeled climatic predictions vary across the ORB and are somewhat uncertain (especially in the latter portion of the 21st century), much of the basin appears likely to experience significantly higher high-flow events and in some cases, lowered low-flow events, interspersed with periods of drought. It is anticipated that changing land use and energy development in conjunction with projected air temperature and flow changes deviating more than 25% from the current levels would impact the natural and human environment. Specifically, it is likely that fish and mussel populations, wetland complexes, reservoir fisheries, trans-boundary organisms such as migratory fish and water body-dependent birds, and human use and safety will also be noticeably impacted.

Institute for Water Resources climate modeling results indicate that climatic conditions in the ORB will remain largely within the mean ranges of precipitation and temperatures, with the exception of a gradual warming that has been experienced between 1952 and 2001. Summer highs and winter lows between 2011 and 2040 are expected to remain generally within what has been observed over that historic period, but extreme fluctuations (record temperatures, rainfall, or drought) are expected to become more likely than before. After 2040, temperatures may rise at one degree per decade through 2099. Likewise, there may be significant changes in precipitation with associated increases or decreases in river flow on an annual mean basis and a seasonal maximum and minimum basis. During 2070-2099, the annual percent change in maximum streamflow increases substantially across Pennsylvania, West Virginia, Ohio, Indiana, and Illinois. It is anticipated there would be some increases between 2040 and 2070 in precipitation and river flow in the base period during the spring season; however, the fall season will bring significant rainfall and increased river flows by as much as 35% to 50% more during the base period.

The NAA or PAA would not involve any activity that could significantly affect the environment in regard to climate. Therefore, no significant adverse impacts to climate would occur as a result of the PAA or NAA. However, under the NAA the City would not be enhancing its resilience to future changes in conditions.

3.4 Terrestrial Habitat

Terrestrial habitat within the project area consists of regularly maintained lawns and rights-of-way, forested areas, and a water treatment plant. Approximately one (1) acre of land would be disturbed with 0.2 acres of permanent tree clearing. The majority of the project would be within the footprint of existing facilities and/or previously disturbed areas. Areas disturbed at Sites 1, 2,



3, and 4 for water main and waterline replacement, refinery tank improvements, fire hydrant relocation/replacement, and installation of the inserta-valves would be restored upon completion of construction activities through soil grading and grass seeding.

Site 5 is located on a forested hillside vegetated with hardwood deciduous trees and shrub growth. Proposed work at Site 5 would impact terrestrial habitat, but the area of disturbance would be minor, and the non-Federal Sponsor would restore areas disturbed by construction activities to their pre-existing conditions as applicable. Only minor impacts to existing vegetation during construction are anticipated to occur. Therefore, no significant long-term impacts to terrestrial habitat are anticipated as part of the PAA.

As selection of the NAA would entail no changes to the project area, there are no impacts to terrestrial habitat anticipated as part of the NAA.

3.5 Prime and Unique Farmland

The Farmland Protection Policy Act requires federal agencies to minimize the conversion of prime and unique farmland to non-agricultural uses. Based on consultation of the United States Department of Agriculture's (USDA) Web Soil Survey, approximately 63.1% of the project area contains soils that are considered prime farmland, 9% of the project area contains farmland of statewide importance, and 0.2% of the project area contains farmland of local importance.

All areas of prime farmland, farmland of state importance, and farmland of local importance are along roads or within residential areas, which are previously disturbed and/or regularly maintained. Therefore, the Corps has determined that no impacts on prime or unique, statewide, or locally important farmland are expected to occur as part of the PAA. Furthermore, on 20 July 2025, the USDA Natural Resources Conservation Service (NRCS) confirmed that the PAA would not impact prime or other important farmland and is therefore not subject to the Farmland Policy Protection Act. See Appendix B for the Web Soil Survey Report and coordination with the NRCS.

There are no impacts to Prime and Unique Farmland anticipated as part of the PAA or NAA.

3.6 Floodplains

Executive Order (E.O.) 11988 requires federal agencies to consider the potential effects of their proposed actions to floodplains. In addition, the 2019 Pleasant's County Floodplain Ordinance requires any development, new construction, substantial improvement, repair of substantial damage, other repairs, or the placement or relocation of any structure (including manufactured homes) in the SFHA complete a floodplain determination and receive an approved floodplain permit. In order to determine the PAA's potential floodplain impact, the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) were reviewed for the proposed project (<https://www.fema.gov/floodplain-management/flood-zones>).

No construction activities would occur within the floodplain or regulatory floodway. A portion of Site 1 for the water main replacement lies within the 0.2% annual chance of flood hazard zone, which is not classified as a Special Flood Hazard Area (SFHA). In addition, underground



infrastructure, such as the water main, would be buried and result in no change in grade or elevation, and waste material would be deposited outside of the floodplain and regulatory floodway. Therefore, a floodplain development permit from the Pleasants County floodplain manager would not be required. The PAA meets the intent of E.O. 11988 and no significant long-term direct or indirect impacts to floodplains are anticipated to occur from the PAA.

As no construction-related activities would be implemented, no additional impacts to floodplains are anticipated to occur from the NAA.

3.7 Aquatic Habitat/Water Quality

The proposed project area is located within the Leith Run-Ohio River watershed (HUC 050302011007) which is part of the greater Ohio River Basin. This section of the Ohio River (Hannibal Locks and Dam to Willow Island Lock and Dam) is on the 303(d) list for impaired waterbodies. Identified issues include polychlorinated biphenyls (PCBs) in fish tissue. According to the U.S. Environmental Protection Agency's (USEPA) How's My Waterway tool, there are no restoration plans for this section of the river. Water withdrawal from the Ohio River is not expected to increase from the proposed improvements, and implementation of the PAA would not result in new discharge of pollutants.

There would be three (3) stream crossings via horizontal directional drilling (HDD) methods at Site 2. Of the three (3) streams, two (2) are ephemeral streams (Stream 2 and 3), and one (1) is a perennial stream (Stream 1). Streams 1, 2, and 3 were determined to be of fair quality, and the dominant substrates are sand and silt. No in-water impacts are anticipated as HDD would be utilized for stream crossings. However, Best Management Practices (BMPs) such as silt fencing and straw wattles would be implemented during construction activities to reduce impacts to aquatic resources. In addition, leakage of drilling fluid is not anticipated. If leakage were to occur, the drilling fluid would be contained in accordance with the Horizontal Directional Drilling Fraction Mitigation Contingency Plan.

Since stream crossings would be constructed via HDD, a permit from the Corps' Regulatory Branch would not be required. On 12 January 2025 the Corps' Regulatory Branch verified that a permit would not be required. Therefore, a Department of the Army permit pursuant to Section 10 of the Rivers and Harbors Act, Section 404 permit, and associated Section 401 permit under the Clean Water Act would not be required prior to construction. If conditions change and it is determined that waters may be impacted, coordination with the Corps' Huntington District Regulatory Branch will be necessary, and all applicable permits shall be obtained by the non-Federal Sponsor. See Appendix B for the Waters Investigation Report and coordination with the USACE Regulatory Branch.

A National Pollutant Discharge Elimination System (NPDES) permit for construction of the proposed action would be required due to the size of the construction area exceeding one (1) acre of disturbance, and an erosion and sediment control plan would be drafted and submitted by the City to the WVDEP prior to construction. Construction-related impacts would be short-term and minor and mitigated through the use of BMPs that would be employed throughout the project areas to prevent runoff into adjacent surface waters.



Based on the above, implementation of the PAA would not result in significant adverse environmental impacts to aquatic habitat and water quality. The PAA is anticipated to have beneficial impacts to drinking water quality by providing reliable water service and higher quality water to residents and businesses.

Under the NAA, no aquatic impacts would occur and water quality in the project area would remain unchanged. However, without the proposed project, the system would continue to deteriorate and become unserviceable.

3.8 Wetlands

According to Burgess & Niple's Waters Investigation Report dated July 2025, there is one (1) palustrine emergent wetland (Wetland 1) within the project area. Wetland 1 is approximately 0.019 acre within the study area of the Waters Investigation Report. Wetland 1 is located in a depression at Site 2 and exhibited hydric soils as indicated by the redox dark surface and wetland hydrology as indicated by the high water table and saturation.



Figure 2 – Wetland 1, facing west

However, there would be no impacts to the wetland by the proposed action as construction activities would avoid the wetland, and BMPs such as silt fencing and straw wattles would be utilized to minimize any indirect impacts. See Appendix B for the Waters Investigation Report for additional information on Wetland 1.

Under the NAA, the project area would remain unchanged, therefore, no impacts to wetlands are anticipated.



3.9 Wild and Scenic Rivers

No designated State Wild or Scenic Rivers are present within the project Area. Therefore, no impacts to these resources are anticipated as part of the PAA or NAA.

3.10 Hazardous, Toxic, and Radioactive Waste (HTRW)

A Phase I Environmental Site Assessment (ESA) for the project was performed in order to identify environmental conditions and the potential presence of HTRW within the project area. No toxic, hazardous, or radioactive substances would be utilized by the project facilities nor is it anticipated that any would be encountered during their construction.

After review of the Phase I ESA, Corps' HTRW staff determined that no further investigation or action is required. Therefore, no impacts to HTRW are anticipated with the PAA. A clearance memorandum was signed by Corps' HTRW staff on 30 September 2025 and is included in Appendix B.

The NAA would not result in ground disturbing activities. Therefore, no direct construction-related HTRW impacts would be associated with the NAA.

3.11 Cultural Resources

Burgess & Niple, on behalf of the non-Federal Sponsor, submitted the proposed project to the West Virginia State Historic Preservation Office (SHPO) for its review and consultation. On 7 July 2025, the SHPO submitted the following comments:

1. The proposed project will have no effect on any architectural resources eligible for or included in the National Register of Historic Places because most of the proposed project will remain underground. Any above ground components will not cause a significant impact to any historic resources. No further consultation is necessary.
2. Archaeological monitoring should occur during all ground disturbing activities in the vicinity of 46PL2 along Bryan Drive and Mound Manor Road (Site 4).

The Corps' Huntington District Archaeologist has reviewed the proposed improvements and agrees with the SHPO's determinations. Work at Site 4 will require a Secretary of Interior Standards qualified archaeological monitor during earth moving activities. In addition, the Corps' Huntington District Archaeologist recommended that Burgess & Niple initiate tribal outreach prior to earth moving activities at Site 4.

In accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (36 Code of Federal Regulations (CFR) Part 800), the Corps' Huntington District will submit an effects determination letter of no adverse effect to the SHPO for its review. Coordination with the SHPO and Tribal nations is ongoing and will be completed prior to issuance of the FONSI. Coordination completed to date is included in Appendix B.

If unanticipated archaeological deposits or human remains are discovered during construction, all work near the location of the discovery shall cease and the Project Manager and Huntington District Archaeologist shall be contacted immediately. The West Virginia State Police, the



Pleasants County Coroner, and SHPO must also be notified immediately if human remains are discovered.

Under the NAA, no construction related actions would be implemented, so no significant detrimental impacts to cultural resources would occur.

3.12 Threatened and Endangered Species

According to the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool, the project area is within the range of the Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), tricolored bat (*Perimyotis subflavus*; proposed endangered), clubshell (*Pleurobema clava*), fanshell (*Cyprogenia stegaria*), longsolid (*Fusconaia subrotunda*), northern riffleshell (*Epioblasma rangiana*), pink mucket (pearlymussel) (*Lampsilis abrupta*), purple cat's paw (=purple cat's paw pearlymussel) (*Epioblasma obliquata*), round hickorynut (*Obovaria subrotunda*), salamander mussel (*Simpsonaias ambigua*; proposed endangered), sheepnose mussel (*Plethobasus cyphus*), snuffbox mussel (*Epioblasma triquetra*), and monarch butterfly (*Danaus plexippus*; proposed threatened). There are no designated critical habitats within the project area.

The project area consists of regularly maintained lawns and rights-of-way, forested areas, and a water treatment plant. In a letter dated 18 June 2025, the West Virginia Division of Natural Resources (WVDNR) indicated that although no known rare, threatened, or endangered species are within the project area, the project area is located within an area designated as a high potential bald eagle nesting habitat. Burgess & Niple had previously performed a site visit in February 2025 to document site conditions including a determination of the presence of potential eagle nests within 660 ft of the project site. No eagle nests were identified during the site visit. In addition, the project is not expected to have significant prolonged construction activities or large (>12-inch dbh) tree removal. If an eagle nest or evidence of eagle nest building activity is discovered within or adjacent to the study area, construction activities will stop and WVDNR shall be contacted by the non-Federal Sponsor.

Approximately one (1) acre of land would be disturbed with 0.2 acres of tree clearing for the proposed improvements. Trees would be cleared during the seasonal tree clearing window of 15 November to 31 March to limit impacts to bats. In addition, there are no mine portals, bridges, nor culverts that are suitable for roosting bats that would be directly impacted by the project. Therefore, the Corps' Huntington District has determined the project may affect but is not likely to adversely affect the Indiana bat, northern long-eared bat, and tricolored bat.

There would be three (3) stream crossings via HDD methods. No in-water impacts are anticipated as HDD would be utilized for stream crossings. However, BMPs would be implemented during construction activities to reduce impacts to aquatic resources. Therefore, the Corps' Huntington District has determined the project may affect but is not likely to adversely affect Federally listed mussel species.

The USACE has reviewed the monarch butterfly habitat description and stressors provided by the USFWS and has determined the proposed project is not likely to jeopardize the continued existence of the proposed species. Critical habitat has been proposed for the monarch butterfly;



however, the proposed project is not located within the designated limits and therefore would not destroy or adversely modify any proposed critical habitat for the monarch butterfly. Based on the information provided and the habitat/stressors, the USACE has determined the project will not jeopardize the continued existence of the proposed species; therefore, further consideration and/or conference under Section 7 (a)(4) is not warranted at this time.

Burgess & Niple on behalf of the Corps' Huntington District completed the determination keys (DKeys) for the northern long-eared bat, tricolored bat, and northeast species on 5 August 2025. The following Federally listed species were identified in the northeast species DKey: clubshell, fanshell, Indiana bat, longsolid, northern riffleshell, pink mucket, purple cat's paw, round hickorynut, salamander mussel, sheepnose mussel, and snuffbox mussel.

The DKeys determined that the proposed action would not likely adversely affect Federally listed species. Therefore, the USFWS concurred with the Corps' Huntington District's determination on 5 August 2025 for northeast species and 20 August 2025 for the northern long-eared bat and tricolored bat. No further coordination under Section 7 of the Endangered Species Act is required. Coordination with the U.S. Fish and Wildlife Service under the Fish and Wildlife Coordination Act is ongoing and will be completed prior to issuance of the FONSI. Coordination completed to date is included in Appendix B.

The NAA would not result in additional ground disturbing activities, tree clearing, or fill within waters. Therefore, there would be no effect to federally threatened and endangered species associated with the NAA.

3.13 Invasive Species

Invasive species can spread easily into native plant communities and displace native vegetation. The proposed project site does not have an existing inventory of invasive species, and their presence is not well known; however, it is anticipated that invasive species will be abundant due to the disturbed roadside setting that much of the proposed project footprint falls in. Invasive species that could occur within the project area includes but is not limited to privet (*Ligustrum spp.*) and tree of heaven (*Ailanthus altissima*).

The PAA is anticipated to have no or negligible beneficial impacts on invasive species. The project area consists of regularly maintained lawns and rights-of-way, forested areas, and a water treatment plant. Much of the project would be within the footprint of existing facilities and/or in previously disturbed areas. The non-Federal Sponsor would revegetate areas disturbed by construction with native plant species to limit the spread of invasive species, which could provide negligible long term beneficial impacts.

As selection of the NAA would entail no changes to the project area, there are no impacts to invasive species anticipated as part of the NAA.



3.14 Air Quality

According to the United States Environmental Protection Agency's (USEPA) EnviroMapper, Pleasants County, WV is in attainment for all criteria air pollutants. In fact, in October 2020, the entire State of West Virginia was designated as meeting all of the USEPA's health-based National Ambient Air Quality Standards (NAAQS) for the first time since 1978, when the initial nonattainment designations were made under the 1970 Clean Air Act.

During construction of the proposed project, temporary air emissions would be generated by the equipment used to install the improvements. Small amounts of dust may be generated during construction and would be held to a minimum by control measures. The proposed infrastructure is not expected to produce noticeable air emissions, nor is it projected to result in increased air emissions from its primary beneficiaries. Contractors would be required to operate all equipment in accordance with local, state, and federal regulations.

Greenhouse gases (GHGs) such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxides (NO_x) are considered pollutants to air quality. The PAA would generate a variety of GHG emissions throughout its life cycle, spanning from construction to operations and maintenance of the project. The PAA includes the construction and installation of various water system improvements. It is anticipated that the majority of GHG emissions from the project would be generated during construction activities, and GHG emissions from the PAA would be minor and temporary in nature. Therefore, impacts to air quality would be temporary for the duration of construction.

The PAA is exempt through 40 CFR §93.153 from making a conformity determination, since estimated emissions from construction equipment would not be expected to exceed *de minimis* levels or have direct emissions of a criteria pollutant or its precursor. Any impacts would be short-term, localized and would occur during construction activities. Impacts to air quality under the PAA would be temporary during construction and would be considered minor.

Under the NAA, no construction related actions would be implemented, so no impacts to air quality are anticipated.

3.15 Noise

Noise associated with the PAA would be limited to that generated during construction. The noise associated with construction would be short in duration and would only occur during daylight hours. Noise is measured as Day Night average noise levels (DNL) in "A-weighted" decibels that the human ear is most sensitive to (dBA). There are no federal standards for allowable noise levels. According to the Department of Housing and Urban Development Guidelines (HUD), DNLs below 65 dBA are normally acceptable levels of exterior noise in residential areas. The Federal Aviation Administration (FAA) denotes a DNL above 65 dBA as the level of significant noise impact. Several other agencies, including the Federal Energy Regulatory Commission, use a DNL criterion of 55 dBA as the threshold for defining noise impacts in suburban and rural residential areas.



According to Dr. Paul Schomer in his 2001 *A White Paper: Assessment of Noise Annoyance*, while there are numerous thresholds for acceptable noise in residential areas, research suggests an area's current noise environment, which has experienced noise in the past, may reasonably expect to tolerate a level of noise about 5 dBA higher than the general guidelines. The Corps Safety and Health Requirements Manual provides criteria for temporary permissible noise exposure levels (see Table 2 below), for consideration of hearing protection or the need to administer sound reduction controls. However, the durations and noise levels are for Occupational Safety and Health Administration (OSHA) standards for employees or personnel.

Table 2 – Permissible Non-Department of Defense Noise Exposure

Duration/day (hours)	Noise level (dBA)
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105

The City's noise ordinance (Saint Marys Codified Ordinance 509.04) states that the erection, excavation, demolition, alteration, or repair of any building in a residential or business district outside of the hours of 7:00 a.m. to 6:00 p.m. shall be considered noises in violation of this section of the Code; as such, construction would only occur between the hours of 7:00 a.m. and 6:00 p.m. to remain in compliance with local regulations. The PAA would take approximately 180 calendar days to construct. All applicable permits shall be obtained by the non-Federal Sponsor.

Construction noise would be similar to that of farm equipment and other small machinery used in the local area. A backhoe, end loader, road grader and/or vibratory roller are examples of equipment that is likely to be used during construction. Each emits noise levels around 85 dBA at 45 feet and 65 dBA at 450 feet. Sensitive noise receptors that could be impacted by construction activities include, but are not limited to, churches, a housing complex, businesses and residential homes. Some of these structures are located as close as 10 feet from the construction work limits (CWL). It is anticipated that construction equipment would be within 450 feet of any given sensitive noise receptor throughout the entirety of construction. Peak outdoor noise levels of approximately 78-98 dBA would occur during the time in which equipment is directly in front of or in proximity to homes or businesses (within 10-100 feet); therefore, a maximum noise exposure of 98 dBA could occur when equipment is within 10 feet of homes and businesses.

The noise projections do not account for screening objects, such as trees, outbuildings or other objects that muffle and reduce the noise being emitted. The outdoor construction noise would be further muffled while residents are inside their homes. In addition, the City shall notify potentially affected homes and businesses within the project area prior to construction. Further, construction noise would be similar to typical neighborhood noise generated by gas powered



lawnmowers in the local area, which could range from 90-95 dBA at three feet and 70-75 dBA at 100 feet.

Due to daytime construction and the short and limited duration of elevated noise levels associated with the PAA, impacts from the noise to local residences and businesses would be direct, temporary, and minor to moderate.

There would be no change in noise and thus no impact under the NAA.

3.16 Socioeconomics

According to the U.S. Census Bureau, the population estimate for Pleasants County, West Virginia is 7,358 and does not contain significant minority populations. Pleasants County is 95.8% white and has a median household income of \$61,038 compared with the median household income of \$54,329 for the State of West Virginia. Individuals residing in Pleasants County below the poverty level is 14.5% compared to 17.9% statewide. In addition, 18.4% of individuals residing in Pleasants County are under the age of 18 compared to 20.1% statewide.

Executive Order (E.O.) 13045, as amended, requires each federal agency “to identify and assess environmental health risks and safety risks that may disproportionately affect children” and “ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks.” This E.O. was prompted by the recognition that children, still undergoing physiological growth and development, are more sensitive to adverse environmental health and safety risks than adults. The potential for impacts on the health and safety of children is greater where projects are located near residential areas.

The proposed water system improvements would benefit residents and businesses in the project area that rely on public water service, thereby improving the living environment for all residents. Only minor and temporary ground disturbing activities would occur during installation of service lines and meters to homes and buildings and areas would be returned to pre-construction conditions, where applicable, upon completion of construction activities through soil grading and grass seeding. Therefore, no homes or buildings would be negatively impacted by the proposed project. The PAA meets the directive of E.O. 13045 by avoiding any disproportionately high adverse human health or environmental effects on children.

Under the NAA, residents would continue to experience unsanitary and unsafe conditions, perpetuating health and safety concerns.

3.17 Aesthetics

The project area is a rural community consisting primarily of residential and commercial properties along a disturbed roadside setting. Aesthetic impacts from this project are expected to be minimal. Temporary disturbance of the local aesthetics would be anticipated during construction of the PAA; however, after construction the excavated areas would be restored to original conditions, as feasible. Therefore, there would be no significant adverse direct or indirect impacts to aesthetics under the PAA.

Neither the PAA nor NAA would significantly impact local aesthetics.



3.18 Transportation and Traffic

The majority of the proposed project would be within existing rights-of-way and/or previously disturbed areas. Construction of the PAA in and along rights-of-way would involve some delays and potential detours in the normal traffic flow. If detours occur, they would be relatively minor and temporary in nature. Construction on or near road surfaces would be in compliance with standard traffic controls to minimize traffic disruptions and avoid public safety problems. No permanent increase or hindrance to traffic flows are expected to result from this project. Impacts anticipated to occur from the PAA would be minimal and temporary in nature.

As selection of the NAA would entail no changes to the project area, there are no impacts to transportation and traffic anticipated as part of the NAA.

3.19 Health and Safety

The PAA has been designed to provide safe, reliable, water infrastructure to the residents and businesses in the project area. The City’s current water system is deteriorating and will become unserviceable. Providing safe and reliable public water service to residents and businesses in the area is necessary. Therefore, the PAA is anticipated to have a long-term, beneficial impact on health and safety for the residents in the project area.

Under the NAA, residents would continue to rely on aging infrastructure, which could fail and pose health and safety concerns which could cause minor to potentially significant negative impacts to the community.

4.0 STATUS OF ENVIRONMENTAL COMPLIANCE

The PAA will be in full compliance with all local, state, and federal statutes as well as executive orders prior to issuance of a Finding of No Significant Impact (FONSI). Compliance is documented below in Table 3.

Table 3 – Environmental Compliance Status

Statute/Executive Order	Full	Partial	N/A
National Environmental Policy Act (considered partial until the FONSI is signed)		X	
Fish and Wildlife Coordination Act		X	
Endangered Species Act	X		
Clean Water Act	X		
Wild and Scenic Rivers Act			N/A
Clean Air Act	X		
National Historic Preservation Act		X	
Archeological Resources Protection Act			N/A
Comprehensive, Environmental Response, Compensation and Liability Act	X		
Resource Conservation and Recovery Act	X		
Toxic Substances Control Act	X		
Quiet Communities Act	X		



Farmland Protection Act	X		
Executive Order 11988 Floodplain Management	X		
Executive Order 11990 Protection of Wetlands	X		
Executive Order 13045 Protection of Children	X		

5.0 REQUIRED COORDINATION

5.1 Agencies Contacted

Direct coordination with the Corps’ Huntington District HTRW section, Corps’ Huntington District Regulatory Branch, USFWS, WVDNR, and NRCS was completed prior to publication of the EA. Coordination with the SHPO and Tribal nations is ongoing and will be completed prior to issuance of the FONSI. Agency correspondence is included in Appendix B.

5.2 Public Review and Comments

The draft EA and FONSI will be available for public review and comment for a period of 30 days, as required under NEPA. A Notice of Availability will be published in the local newspaper, The St. Marys Oracle, advising the public of this document’s availability for review and comment. A copy of the draft EA will also be placed in the Pleasants County Public Library and made available on-line at <https://www.lrd.usace.army.mil/News/Project-Documents-Notices-Public-Review/>. The mailing list for the draft EA is located in Appendix C.

6.0 CONCLUSION

The City is proposing to improve its water system in Pleasants County, West Virginia. The project is necessary to repair and replace water infrastructure that is deteriorating and will become unserviceable. By providing a safe and reliable water system, the proposed project is anticipated to have long-term beneficial impacts on health and safety for residents in the project area and surrounding area by providing clean, potable water. No significant, adverse impacts have been identified as a result of implementation of the proposed improvement project. The NAA is considered unacceptable due to health and safety hazards for the community in the proposed project area.

The project area consists of regularly maintained lawns and rights-of-way, forested areas, and a water treatment plant. Health and safety impacts would be realized immediately with project implementation. Effects associated with construction would be minor and temporary. BMPs would be implemented during construction to minimize impacts to residents and the environment. Therefore, the PAA would not be expected to have significant adverse impacts on the human or natural environment.

7.0 LIST OF INFORMATION PROVIDERS AND PREPARERS

The following agencies were involved in preparation of the EA.



Burgess & Niple, Inc.
[REDACTED]
[REDACTED]

U.S. Army Corps of Engineers Huntington District
[REDACTED]
[REDACTED]
[REDACTED]

8.0 REFERENCES

Burgess & Niple, Inc. Draft Environmental Assessment – St. Marys, WV Water & Sanitary Sewer Improvements, Phase I.

Federal Emergency Management Agency
2025 Floodplain Maps Website: <https://msc.fema.gov/portal/home>

Institute for Water Resources
2017 Ohio River Basin – Formulating Climate Change Mitigation/Adaptation Strategies through Regional Collaboration with the ORB Alliance

Schomer, Paul
2001 A White Paper: Assessment of Noise Annoyance. Schomer and Associates

Szyk, Bogna
2025 Distance Attenuation Calculator Website:
<https://www.omnicalculator.com/physics/distance-attenuation>

U.S. Census Bureau
2025 American FactFinder Website:
<https://www.quickfacts.census.gov>

U.S. Environmental Protection Agency
2025 How's My Waterway Waterbody Report website:
<https://mywaterway.epa.gov>

U.S. Fish and Wildlife Service
2025 National Wetlands Inventory website: <https://www.fws.gov/wetlands/data/mapper.html>

U.S. Fish and Wildlife Service
2025 Information for Planning and Conservation website: <https://www.fws.gov/ipac>

U.S. Geological Survey
2025 StreamStats: Streamflow Statistics and Spatial Analysis Tools for Water- Resources Application. StreamStats Application Website: <https://streamstats.usgs.gov/ss/>