



**U.S. Army Corps of Engineers
Baltimore District**

**FINDING OF NO SIGNIFICANT IMPACT AND
ENVIRONMENTAL ASSESSMENT**

**GUILFORD TOWNSHIP AUTHORITY
MARION SEWER LINE EXTENSION PROJECT
MARION, GUILFORD TOWNSHIP, PENNSYLVANIA**

**SECTION 313 SOUTH CENTRAL PENNSYLVANIA
ENVIRONMENT IMPROVEMENT PROGRAM**

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FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Guilford Township Authority – Marion Sewer Line Extension Project Marion, Franklin County, Pennsylvania

In accordance with the National Environmental Policy Act (NEPA) of 1969, as amended, the U.S. Army Corps of Engineers (USACE), Baltimore District has prepared an Environmental Assessment (EA) to evaluate the environmental impacts of the Guilford Township Authority (GTA) Marion Sewer Line Extension Project. The USACE, Baltimore District is cost sharing the project with the GTA, the non-federal sponsor, under the Section 313 South Central Pennsylvania Environment Improvement Program (Section 313 Program). The project involves installation of a pressure sewage collection system primarily within existing road rights-of-way (ROWs) and previously disturbed areas, along with grinder pumps to accommodate the anticipated connections. The project would provide sewage service for the residents and commercial properties in the community of Marion, located in Guilford Township, Franklin County, Pennsylvania. Residents and commercial properties currently rely on on-lot sewage systems, which constrain future development and pose potential risks to groundwater quality.

The Section 313 Program was established in Section 313 of the Water Resources Development Act (WRDA) of 1992, as amended. The primary objective of the Section 313 Program is to provide design and construction assistance to non-federal interests for carrying out water-related environmental infrastructure and resource protection and development projects in south central Pennsylvania, including projects for wastewater treatment and related facilities, water supply, storage, treatment, distribution facilities, and surface water resource protection and development. This project is located in Franklin County, Pennsylvania, which is one of the counties authorized under WRDA of 1992 to participate in the Section 313 Program.

The EA evaluated the potential environmental impacts of three alternatives. Alternative #1, the No-Action Alternative, assumes that no sewage collection system would be implemented in Marion, Alternative # 2, installation of a gravity sewer system between Marion and the Shalom Pump Station utilizing six pump stations, and Alternative #3, the Preferred Alternative, proposes the installation of a low-pressure sewage collection system and use of grinder pumps to serve the community of Marion.

Potential impacts to the human and physical environmental from the alternatives were assessed. Short-term, minor, adverse impacts during construction of the proposed project includes an increase in dust, air emissions, and noise; disturbance to wildlife; potential disruption of traffic; and the temporary loss of vegetation (grass and shrubs) in some areas. Appropriate steps to minimize potential adverse impacts, such as the implementation of best management practices, will be incorporated into the project. A portion of the sewer line will be installed underneath a stream by open trenching using a flume pipe. The flume setup keeps the stream flow from contacting disturbed ground from the trench until it has been backfilled and stabilized. The existing channel is shallow, narrow, and unlikely to support a diverse biological community other than tolerant macroinvertebrate species. The stream banks are very steep and largely made of rocks, asphalt, and yard waste. The proposed project is not expected to result in adverse impacts to surface water quality, wetlands or floodplains, threatened and endangered species or

their critical habitats. Additionally, no impacts are anticipated to cultural resources or tribal resources, including properties listed on the National Register of Historic Places.

The accompanying EA, which will be made available for a 30-day public review, supports the conclusion that the project does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, an Environmental Impact Statement is not necessary to perform the proposed sewer line installation.

Date

Francis B. Pera
Colonel, U.S. Army
Commander and District Engineer

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Attachment A	Figures, Supporting Documents, and Construction Plans
Attachment B	Agency Coordination and Public Review
Attachment C	Project Erosion and Sedimentation Control Plans
Attachment D	EDR Radius Review (under separate cover)

1 Introduction

This Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) have been prepared by the U.S. Army Corps of Engineers (USACE), Baltimore District and Buchart Horn, Inc. (BH) on behalf of the Guilford Township Authority (GTA), pursuant to the National Environmental Policy Act of 1969, as amended (NEPA), and USACE Engineer Regulation (ER) 200-2-2. USACE has rescinded ER 200-2-2; however, actions that were “ongoing as of the effective date” of the rule, June 30, 2025, “will continue to use the rule in place at the time the action was started.” (Procedures for Implementing NEPA; Removal, Vol. 90, No. 126 F.R. 29461 (July 3, 2025)). Therefore, this EA has been reviewed in accordance with the NEPA implementing regulations for Army Civil Works at 33 CFR Part 230 and ER 200-2-2. This EA evaluates the potential environmental, cultural, and socioeconomic impacts from two project alternatives, the No-Action Alternative and the Preferred Alternative. The USACE, Baltimore District, is cost sharing the project with GTA, the non-federal sponsor (NFS), under the Section 313 Program.

1.1 Project Authority

The “South Central Pennsylvania Environmental Restoration Infrastructure and Resource Protection Development Pilot Program” was established in Section 313 of the Water Resources Development Act (WRDA) of 1992 (Public Law [PL] 102-580). Section 313 of WRDA 1992 was amended by Section 345 of WRDA 1996 (PL 104-303). One of the amendments in WRDA 1996 changed the Section 313 heading to “Sec. 313. South Central Pennsylvania Environment Improvement Program.” Section 313 of WRDA 1992 was also amended by Section 3143 of WRDA 2007 (PL 110-114), Section 352 of WRDA 2020 (PL 116-260), and Section 8376 of WRDA 2022 (PL 117-263). The South-Central Pennsylvania Environmental Improvement Program (Section 313 Program) provides design and construction assistance for water-related environmental infrastructure and resource protection and development projects for non-federal interests in south central Pennsylvania counties, including projects for wastewater treatment and related facilities, water supply, storage, treatment, distribution facilities, and surface water resource protection and development. The Marion Sewer Line Extension Project (project) is located in Franklin County, Pennsylvania-one of the counties authorized under WRDA of 1992 to participate in the Section 313 Program.

1.2 Project Location

The project is situated in the unincorporated community of Marion, located within Guilford Township in Franklin County, Pennsylvania. The proposed project falls within the Potomac River Watershed and the Greencastle U.S. Geological Survey (USGS) 7.5-minute quadrangle. A location map with the project’s proposed limits of disturbance (LOD) is located in Attachment A, Page 3.

1.3 Purpose and Need

The purpose of the project is to provide public sanitary sewer service to the GTA’s southwest-most community, Marion. This project addresses a critical need to replace failing on-lot sanitary systems, thereby helping to prevent groundwater contamination.

Growth along the southern Interstate-81 corridor of Guilford Township, particularly the area zoned for Industrial (Attachment A, Guilford Township, 2022), is rapidly increasing. Currently, there are three major industrial projects under review, and a new interchange (Exit 12) is slated for construction in the very near future. This project is needed to support the region's significant growth and ensure sustainable development while protecting vital environmental resources.

1.4 Public and Agency Coordination

In compliance with NEPA, coordination was conducted with federal government agencies and tribal nations, as well as state and local resource agencies (Attachment B). A public notice of availability for the EA will be posted by the NFS in a local newspaper and published for general circulation in Franklin County, Pennsylvania. The public will have 30 days to provide comments on the EA from the date of the notice. The USACE will also post a public notice on the Baltimore District public notice website.

Buchart Horn, Inc. and USACE, Baltimore District coordinated with the State Historic Preservation Office (SHPO), a bureau of the Pennsylvania Historical and Museum Commission (PHMC), to ensure compliance with Section 106 of the National Historic Preservation Act. In a letter dated October 9, 2024, the SHPO stated that the proposed project will have no effect on above-ground historic or archeological resources. In addition, consultation letters were sent by the USACE in September 2024 to the Delaware Nation, Delaware Tribe of Indians, Shawnee Tribe, and the Tuscarora Nation, which are the four federally recognized tribes identified by the U.S. Department of Housing and Urban Development's (HUD) Tribal Directory Assessment Tool (TDAT) that have potential interest in the project area. No responses were received from the tribal nations contacted above and, therefore, no impacts are expected from this undertaking on tribal resources.

Agency coordination was conducted by BH through the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) online system on March 13, 2025. The USFWS species determination keys were completed on May 30, 2025. A Pennsylvania Natural Diversity Inventory (PNDI) review was also performed for the final project plan on November 5, 2024. In a letter dated November 12, 2024, the Pennsylvania Fish and Boat Commission (PFBC) stated that no adverse impacts are expected to state species of special concern given the nature of the proposed project. All agency coordination documents, and permits and approvals currently acquired, are contained in Attachment B.

The project will require an application for a Pennsylvania Department of Environmental Protection (PADEP) 25 PA §105 General Permit (GP) 5 for new utility crossings of regulatory waters (Attachment B). This permit has been obtained as of January 24, 2025 (Attachment B).

2 Project Description

The GTA is proposing an infrastructure project in Franklin County, Pennsylvania aimed at addressing the ongoing challenges posed by failing on-lot septic systems. This project will connect approximately 600 individual homes, businesses, and schools located in the community of Marion to the existing GTA sanitary sewer system. The project consists of approximately 27,000 linear feet of low-pressure sewer main along with grinder pumps to accommodate the

anticipated connections. The new sewer line will connect to the existing sanitary sewer system at the Shalom Pump Station located north of Marion and next to the Shalom Christian Academy near the Molly Pitcher Highway (Route 11). A low-pressure conveyance system utilizing grinder pumps will be used to efficiently transport sewage from the project area to this connection point.

The sewer line will be installed primarily within existing rights-of-way (ROWs) of state and local roads. A portion of the pipeline will need to be installed beneath existing railroad tracks. An executed agreement countersigned by Norfolk Southern Railway Company was obtained from the NFS on June 17, 2025. A Pipeline Occupancy Authorization has been obtained for installing the sewer line beneath its tracks (Attachment B).

3 Alternatives Considered

3.1 Alternative #1 – No-Action

Under the No-Action Alternative, no sewer extension would be completed for the community of Marion. Sewage management would continue to be treated through existing on-lot septic systems or future on-lot septic systems as these are approved by the Township.

3.2 Alternative #2 – Gravity Sewer System

Preliminary design of the sewer extension evaluated use of a gravity sewer system between Marion and the Shalom Pump Station. Attachment A contains plans showing the layout of sewer main developed to cover the service area using gravity drainage. Sewer main installations would be almost entirely within existing roads or ROWs, with laterals to individual sewage sources branching from these mains across roads, open ground, or other cover types that best minimizes the distance of trenching to reach the source. It was determined that local topography would not allow a system that is fully conveyed by gravity to work effectively because some trench cuts could reach 20 feet or more in depth. As such, this design would also require six intermediate pump stations to move sewage to the Shalom Pump Station. In this configuration, the gravity sewer system would be capable of meeting the project goal of eliminating on-lot septic systems but may not be feasible due to the topography and potential trenching.

3.3 Alternative #3 – Low-Pressure Sewer System (Preferred)

This alternative will extend the existing GTA sanitary sewer system to serve the community of Marion. It will utilize grinder pumps at individual properties to create a low-pressure sewage conveyance system. The proposed extension includes approximately 27,000 linear feet of low-pressure sewer main, along with the installation of grinder pumps to support the expected number of connections. Alternative #3 meets the project's purpose and need.

3.4 Evaluation of Alternatives

Marion and its surroundings are underlain by Ordovician-ages limestones. Karst topography associated with the limestones is evident by the lack of streams with developed beds and banks within the local drainages. Surface flows other than flood flows are infiltrated rapidly to the

subsurface and water table. Effluent from typical on-lot septic systems may similarly be infiltrated to the water table without significant attenuation of contaminants. Without the sewer extension, future land development would also have to rely on on-lot septic systems, further increasing the potential contaminant loading to the groundwater. As such, the No-Action Alternative is of no benefit to the environment and potentially a detriment, and, since it does not achieve the project goal of eliminating on-lot septic in Marion, it is not considered to be a viable alternative.

Construction of Alternative #2 would be difficult due to the limestone bedrock in the project vicinity. Excavation for water lines in this area has demonstrated that bedrock is very shallow in many locations. Even with intermediate pump stations, achieving grade for gravity lines would require extensive excavation through bedrock in some locations. This would translate into larger surface impacts due to more excavated material to stage, increased safety risks due to confined space construction and blasting, slow installation progress, and greater construction cost. Additionally, deep excavations through bedrock may result in increased infiltration and potential for void development in the limestone along the sewer lines. The requirement to power six intermediate pump stations also means that there is no substantive long-term electrical energy savings compared to a low-pressure system. For these reasons, Alternative #2 is not considered to be the preferred alternative and is not being evaluated in the impacts analysis (Section 4) because of the challenges described above and the increase in detrimental impacts to environmental resources associated with increased excavation and handling of sub-surface soils.

Alternative #3 would require less rock excavation than Alternative #2 resulting in a reduced volume of material needing temporary excavation and on-site storage for backfilling. This, in turn, would minimize the project's temporary surface impact area. Alternative #3 could be constructed faster than Alternative #2 because it does not involve large quantities of rock excavation, thereby reducing the duration of disturbance to the environment. Alternative #3 would result in less potential environmental impacts than Alternative #2 while still covering the same service area and meeting the project's purpose and need, therefore, Alternative 3 has been selected as the Preferred Alternative.

4 Existing Conditions and Project Impacts

This section describes the existing conditions (the Affected Environment for NEPA purposes) and the potential project impacts on natural, cultural, and socioeconomic resources that are applicable to the area affected by the project alternatives.

For the purpose of describing existing conditions and environmental impacts, the project area is defined as the area directly affected by project construction and its limits of disturbance (LOD). The LOD for Alternative #3 (Preferred) is shown in the project drawings in Attachment C. The project area is located primarily within existing road ROWs in Marion. Existing information including online government agency databases and resource information, Google Earth Pro, Google Maps imagery, and on-site investigations were used to assess existing conditions, as listed in the references section.

4.1 Land Use

The primary land uses in the project area are residential and commercial. The community is primarily residential in nature, with a mix of single-family homes, townhouses, and apartments. There are also some commercial developments, agricultural fields and wooded areas as well. Overall, the land use in these areas is well-established and primarily serves the needs of the residents.

The No-Action Alternative and Alternative #3 (Preferred) will not impact land use, nor will the land use type be changed. Alternative #3 (Preferred) would include subsurface installations which would not permanently affect surface land use. Alternative #3 (Preferred) relies on the new Shalom Pump Station as the collection point for sewage from Marion. The GTA did not have to change the land use zoning for construction of this station because it is an exempted government facility.

4.2 Geology and Topography

Marion is located in the Ridge and Valley physiographic province of south-central Pennsylvania. The region is characterized by flat residential and commercial areas, gently rolling hills, and valleys, with elevations ranging from 580 to 660 feet above sea level. The underlying geology is predominantly limestone and argillaceous limestone that were formed during the Ordovician. These rock formations are often exposed at the surface and can be seen in outcrops in nearby fields.

The proposed LOD would occur primarily within existing road ROWs, and the land will be returned to its existing condition to the maximum extent practicable immediately after construction. No impacts to geology or topography are anticipated from the No-Action Alternative. Alternative #3 (Preferred) would cause adverse impacts to local topography which would be short-term and minor.

4.3 Soils

The web-based U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey was used to determine that the soil types found within the proposed project area are primarily composed of well drained silty clay and silty loams. Overall, the soil in Marion is generally well-drained and suitable for development, with some variations in soil type and characteristics depending on the specific location. See Attachment A for the USDA NRCS Soil Report.

No impacts to soils are expected to occur as part of the No-Action Alternative. Alternative #3 (Preferred) is expected to have short-term, minor, adverse impacts to soils that will only occur during construction of the project. Excavated soil would be replaced in-kind after the installation of the below-ground water line. Areas of earth disturbance will be restored to pre-project grades and seeded following construction. Best Management Practices (BMPs) and sediment and erosion control measures will be implemented in accordance with Pennsylvania state standards to reduce the discharge of sediment-laden runoff from the project site.

4.4 Prime and Unique Farmlands

A review of soil farmland classes within the project area was performed using the USDA Web Soil Survey. Prime farmland and farmland of statewide importance are mapped within the project area; however, conversion of land use would not apply under the proposed project. The project area will be within the state and local roads and railroad ROWs, and in areas that were previously disturbed and/or developed. No land conversion of existing farmland will occur as a result of this project.

4.5 Surface Waters

Remote and field investigations identified one regulated surface water feature that would be affected by Alternative #3 (Preferred): an unnamed tributary (UNT) to Conococheague Creek crossing Route 11 just south of the intersection with Main Street in Marion. Alternative #3 (Preferred) would cause a temporary impact to the stream in order to trench the sewer pipe under the waterway. The contractor will access the crossing from either side using the temporary rock construction entrances coming off Route 11. The sewer line will be installed under the stream by open trenching using a flume pipe. The flume setup keeps the stream flow from contacting disturbed ground from the trench until it has been backfilled and stabilized. The impact after the bank has been stabilized would be minor and temporary until vegetation is regenerated. The existing channel is shallow, narrow, and unlikely to have a diverse biological community other than tolerant macroinvertebrate species. The stream banks are very steep and largely made of rocks, asphalt, and yard waste. The contractor will apply erosion mat to the regraded banks on completion.

The UNT to Conococheague Creek is designated in 25 PA §105 (PA Code, n.d.) for the following uses: Warm Water Fishery (WWF) and Migratory Fishes (MF). Alternative #3 (Preferred) has an approved water quality management application (WQM Permit No. 2824406) for a Pennsylvania Department of Environmental Protection (PADEP) 25 PA §105 General Permit (GP) 5 for new utility crossings of regulatory waters (Attachment B). A flumed stream crossing will be utilized when trenching through the stream channel. Water accumulating within the work area will be pumped to a designated and approved filter bag/sediment trap before being discharged into surface water. The No-Action Alternative would have no adverse impacts on surface water quality as no construction is proposed under this alternative.

4.6 Floodplains

Executive Order 11988 requires federal agencies to take into consideration the impacts that its actions will have on floodplains. According to the Federal Emergency Management Act's (FEMA) Flood Insurance Rate Map (FIRM) for the project area (Attachment A), Alternative #3 (Preferred) would take place in a 100-year floodplain within the stream crossing identified as UNT to Conococheague Creek. However, the project would also minimally encroach into the floodplain on Front Street and on Angle Road. Short term, minor impacts would occur to the floodplain as a result of sewer line installation. However, the floodplain will be returned to its original and existing grade. Because GTA is a Pennsylvania public entity, permitting of temporary floodplain impacts for Alternative #3 (Preferred) has been completed under 25 PA §106, which is concurrent with approval of a 25 PA §105 permit.

The No-Action Alternative would have no floodplain encroachments and would require no 25 PA §106 permitting.

4.7 Wetlands

Executive Order 11990 requires federal agencies to evaluate potential impacts to wetlands, consider alternatives to wetland sites, and limit damage to wetlands if impacts cannot be avoided. Wetlands are defined as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands perform important water quality functions such as filtration and provide food and habitat for fish and other wildlife. Along with open water, wetlands are breeding, spawning, feeding, cover and nursery areas for fish and are important nesting, migrating, and wintering areas for waterfowl and other wildlife.

No wetlands were observed within the project LOD during a site investigation on October 18, 2023, or during a wetland investigation for the UNT Conococheague Creek stream crossing on August 11, 2024 (Attachment A). A review of the USFWS's National Wetlands Inventory (NWI) shows no wetlands within the LOD of the project (Attachment A). The No-Action Alternative would have no adverse impacts to wetlands as no wetlands exists within the proposed project footprint. Alternative #3 would result in no impacts to wetlands.

4.8 Wild and Scenic Rivers

The National Park Service's National Wild and Scenic Rivers Systems and Pennsylvania Department of Conservation and Natural Resources' Scenic Rivers Map (see Attachment A) was used to assess the presence of Wild and Scenic Rivers within the project area. There are no federal- or state-designated Wild and Scenic Rivers within the project area; therefore, no impacts to these resources will occur from the No-Action Alternative or Alternative #3 (Preferred).

4.9 Terrestrial Resources

The principal species of game in Franklin County, Pennsylvania include white-tailed deer, turkey, and a variety of small mammals, including squirrel and rabbit. The project area is comprised of residential and commercial lots with some agricultural and wooded areas. Due to the proximity to city, state roads, and railroads, the vegetation within the project area is predominantly manicured grass and shrubs.

Construction of Alternative #3 (Preferred) would be limited to existing, pre-disturbed city roads, state roads, and railroad ROWs and would have short-term, minor impacts to wildlife. Temporary displacement of wildlife may occur during construction, but wildlife is expected to return to the area after construction is complete. Since the work would be conducted in existing ROWs and previously disturbed areas, no significant adverse impacts to terrestrial resources are expected. No impacts to terrestrial resources will occur as part of the No-Action Alternative.

4.10 Rare, Threatened and Endangered Species

The USFWS IPaC System website and Pennsylvania’s PNDI system were consulted to identify federal and state-listed species that could potentially occur in the project area (Attachment B). An Endangered Species Act species list was generated on March 13, 2025, and May 30, 2025, and five species were identified as potentially occurring within the project area: the federally-endangered Indiana Bat (*Myotis sodalis*), the proposed federally-endangered Tricolored Bat (*Perimyotis subflavus*), the proposed federally-threatened Green Floater Clam (*Lasmigona subviridis*), the proposed federally-threatened Monarch Butterfly (*Danaus plexippus*), and the federally-endangered Northeastern Bullrush (*Scripus ancistrochaetus*). See Attachment B for USFWS and PNDI review responses detailing the No-Effect Determinations for Alternative #3 (Preferred). As part of the PNDI review, coordination was conducted with the Pennsylvania Fish and Boat Commission (PFBC) regarding a potential conflict with unnamed “sensitive species” under their jurisdiction. The PFBC responded in a letter dated November 12, 2024, that “...no adverse impacts are expected to the species of special concern.” The following are summaries of the federally-listed species identified by IPaC as potentially occurring in the project area:

- The Indiana Bat is found in a wide range of habitats, including deciduous forests, mixed forests, and agricultural lands. It is most commonly found in areas with large, mature trees that provide suitable roosting sites (USFWS, 2024a). The IPaC system did not provide a determination key to complete for this species. No trees are expected to be removed during construction of Alternative #3 (Preferred). As such, no impacts to these bats are anticipated for Alternative #3 or the No-Action Alternative.
- The Tricolored Bat hibernates in caves and mines during the winter months and primarily roosts among leaves of live or recently dead deciduous hardwood trees during the summer months. They may also be found roosting in pine trees and occasionally human structures. (USFWS, 2024b.). The IPaC system determination key for this species returned a determination of Not Likely to Adversely Affect (Attachment B). USACE Baltimore further consulted with the USFWS State College field office for potential impacts to Tricolored Bat. The USFWS field office determined in an email that no further action is required for Tricolored Bat or any of the listed species from the IPaC (Attachment B). No hibernacula are expected to occur within the project area, and no trees are expected to be removed during construction of Alternative #3 (Preferred). As such, no impacts to these bats are anticipated for the Alternative #3 or the No-Action Alternative.
- Green Floater Clams prefer streams with slow to medium flows and good water quality. They are often found in sand or small gravel substrates where they establish a foothold and bury themselves as deep as 15 inches. They have limited mobility, and fast-flowing currents or high-water events can cause them to be washed downstream. When they occur in larger streams and rivers, they are found in quieter pools and eddies, away from strong currents. (USFWS, 2024c). The IPaC system did not provide a determination key to complete for this species. Alternative #3 (Preferred) takes place almost entirely within in the ROWs of roads except for the stream crossing at UNT to Conococheague Creek. This stream is steep, fast-moving, and a rocky cobble bottom,

so it is not suitable habitat for these clams, and they should not be present. As such, no impacts to Green Floater Clams are anticipated for the Alternative #3 or the No-Action Alternative.

- The Northeastern Bullrush is a wetland species whose optimal habitat includes fluctuating water levels, little canopy cover, and acidic to circumneutral soils with high organic matter (i.e. ridge top vernal pools) (USFWS, 2024e.). The IPaC system did not provide a determination key to complete for this species. The only water feature to be affected by Alternative #3 (Preferred) is the UNT to Conococheague Creek, which is fast-moving, densely covered, and alkaline and would not be suitable habitat for Northeastern Bullrush. As such, no impacts to the Northeastern Bullrush are anticipated for Alternative #3 or the No-Action Alternative.
- Monarch Butterflies are dependent on milkweed for reproduction and flowering plants in general for sustenance. The IPaC system did not provide a determination key to complete for this species (USFWS, 2024e). Due to the project's footprint being limited to impervious surfaces or mowed lawns, no permanent adverse impacts to Monarch Butterflies would be expected from the construction of Alternative #3 (Preferred). As such, no impacts to Monarch's are anticipated for Alternative #3 or the No-Action Alternative.

The IPaC results further indicate several migratory bird species that may be present in the area during a given year: bald eagle (*Haliaeetus leucocephalus*), black-capped chickadee (*Poecile atricapillus praticus*), chimney swift (*Chaetura pelagica*), red-headed woodpecker (*Melanerpes erythrocephalus*), rusty blackbird (*Euphagus carolinus*), and wood thrush (*Hylocichla mustelina*). According to the USFWS Bald Eagle Nest Sites (USFWS, 2021) open data portal, no eagle nests exist within the proximity of the proposed construction. No trees are expected to be removed during construction of Alternative #3 (Preferred). As such, no impacts to these migratory birds or bald eagles are anticipated for Alternative #3 or the No-Action Alternative.

4.11 Air Quality and Greenhouse Gas Emissions

Franklin County is listed as being in attainment for all criteria pollutants in the United States Environmental Protection Agency's (USEPA) Green Book National Area and County-Level Multi-Pollutant Information list (USEPA, 2024) (Attachment A). Minor, short-term, and localized direct impacts to air quality would occur as a result of construction activities that generate exhaust emissions and fugitive dust.

USEPA regulates greenhouse gas emissions (GHGs) through mobile source emission standards and permitting requirements under the Title V Operating Permits program. These regulations include fuel efficiency and renewable fuel standards on light-duty, medium-duty, and heavy-duty vehicles. However, localized incremental emissions from construction vehicles and equipment are unlikely to have a measurable effect. The only permanent emission sources currently present within the project area include residential homes and small businesses. Motor vehicles are the predominant mobile sources.

Criteria pollutant emissions from Alternative #3 (Preferred) would cease once construction stops, and no new stationary emission sources would be created. Emissions from the combustion of fossil fuels as part of the construction of Alternative #3 (Preferred) would not pose a significant risk to the environment or the health of workers or the public because they would be short-term and minor in quantity. GHG emissions from Alternative #3 (Preferred) would cease once construction stops and no new stationary emission sources would be created. No impacts to air quality will occur as part of the No-Action Alternative.

4.12 Noise

Noise levels are measured in decibels (dBA) for regulatory purposes. The threshold of human hearing is 0 dBA, with values above 85-90 dBA considered to be loud and potentially harmful to hearing if given sufficient exposure time. Noise levels above 140 dBA can cause damage to hearing after a single exposure (OSHA, n.d.). The project area is adjacent to both residential and commercial areas. A common source of noise within the project area includes existing vehicular and rail traffic on Route 11.

Noise generated during construction is expected to be a result of construction only. There would be no permanent changes to the noise levels in the project area; however, some of these construction activities may exceed values above 85-90 dBA during construction. This increased noise should be contained to normal business hours. In Franklin County, Pennsylvania, noise ordinances are enforced at the municipal level. Each municipality within the county has its own specific rules and restrictions regarding noise levels and times. General guidelines often include restrictions on loud noises during nighttime hours, typically from 10 p.m. to 6 a.m. or 7 a.m., and may also regulate the use of audio devices, vehicle exhausts, and animal noises. Short-term, minor, adverse noise impacts associated with Alternative #3 (Preferred) are expected in areas adjacent to construction work sites. No adverse noise impacts will occur as part of the No-Action Alternative.

4.13 Cultural Resources

The USACE is required by Section 106 of the National Historic Preservation Act and Executive Order 11593 to identify all archaeological resources and historic properties within a project's area of potential effect that are eligible for listing in the National Register of Historic Places, and to assess the project's effect on those properties. Coordination was initiated with the PA SHPO, the PHMC, for the proposed project. Buchart Horn Inc. submitted a request to PHMC on behalf of the GTA to identify potential cultural resource concerns related to the project.

In a response letter dated October 9, 2024, PHMC indicated no above ground resources and no archaeological concerns for the project (Attachment B). Based on this evaluation, no effect will occur to cultural resources for the No-Action Alternative or Alternative #3 (Preferred).

Consultation letters were electronically mailed by the USACE in September 2024 to the Delaware Nation, Delaware Tribe of Indians, Shawnee Tribe, and the Tuscarora Nation, which are the four federally recognized tribes with potential interest in the project area. No responses were received from the tribal nations and, therefore, no impacts are expected from this undertaking.

4.14 Aesthetics and Recreation

The project area is predominantly residential and/or commercial. There are athletic fields, open spaces, and agricultural areas located near the LOD for the project. Temporary impacts to aesthetics could occur during construction. However, no permanent impacts to aesthetic or recreational impacts from Alternative #3 (Preferred) are anticipated because sewer line installation areas will be returned to grade and revegetated. No impacts to aesthetics and recreation would occur as part of the No-Action Alternative.

4.15 Transportation

The LOD of the project is located in a predominantly residential area with some commercial properties. The project area has low traffic volume except for Route 11. Short term, minor, adverse impacts to transportation are likely to occur as a result of the construction activities associated with Alternative #3 (Preferred) due work needed within the ROW of local and state roads. Traffic may temporarily be stopped or rerouted. The road rerouting and closings would follow Pennsylvania Department of Transportation regulations. Roads, driveways, and sidewalks damaged during construction would be properly repaired and replaced as needed. No impacts to existing transportation conditions will occur as part of the No-Action Alternative.

4.16 Demographic and Socioeconomic Conditions

According to the U.S. Census Bureau, 2024 American Community Survey (ACS) report (see Attachment A), there was a population of 15,055 in Guilford Township, PA. The ages for Guilford Township are 6.9 percent of the population are under the age of 5, 19.8 percent are under 18 years of age, and 26.6 percent over 65 years of age. Minorities comprised 15.8 percent of the population compared with 25.9 percent statewide. The median household income was \$71,846 for Marion compared to \$74,946 for Franklin County. The low-income population rate of 10.8 percent for Guilford Township was lower than the state average of 12.0 percent.

The impacts of Alternative #3 (Preferred) on demographic and socioeconomic conditions are considered positive when acknowledging the need for the project, which would reduce and prevent contamination of groundwater resources by failing on lot sanitary systems. Improvements to the wastewater removal and treatment are expected to improve the quality of life for the residents and maintain local business operations for commercial properties within the project's service area.

Impacts to demographic and socioeconomic conditions may occur as part of the No-Action Alternative. Not updating the wastewater system will discourage additional development of undeveloped or underdeveloped parcels within the service area. Current and future residents of Marion would not benefit from the installation of a sanitary wastewater line to increase capacity for community and economic growth. The No-Action Alternative would not meet the need for the project of protecting groundwater resources from contamination and allowing for future development.

4.17 Hazardous, Toxic, and Radioactive Substances

On October 18, 2023, BH staff conducted a site visit of the proposed project area, including observation of the alignment and its surroundings for recognized environmental conditions. This was informed by an EDR Radius Review conducted on August 10, 2023, for search radii corresponding to those used for Phase I Environmental Site Assessments under ASTM E1527-21 (Attachment D, under separate cover). Additionally, reviews of the USEPA NEPAassist database and Pennsylvania’s eMapPa were conducted. No recorded sources of hazardous, toxic, and radioactive wastes (HTRW) were identified in the proposed project area or within 1,000 feet of the project area. Therefore, no impacts from HTRW are anticipated. If any contamination is discovered, work at the site of the contamination would cease until coordination with the PADEP and USACE could occur, and appropriate remediation and proper safety measures are implemented. No impacts to HTRW would occur as part of the No-Action Alternative.

5 Summary

Overall, the project is needed to install infrastructure to remove and properly treat septic wastewater and to protect groundwater resources for the residents and commercial properties within the project area. The project would provide benefits to both demographic and socio-economic conditions as it would remove on-lot sewage disposal capacity as a limiting factor for development. No impacts, during or post construction of Alternative #3 (Preferred), are expected to occur to the land use, Prime and Unique farmlands, wetlands, Wild and Scenic Rivers, federal- or state-listed species, or cultural resources within the project area. Some minor, temporary, adverse impacts are expected to occur to the soils, surface waters, floodplains, air quality, aesthetics, and transportation during the construction phase of Alternative #3 (Preferred). However, once construction has been completed, these impacts will cease to occur. Additionally, no hazardous waste is expected to be produced as a result of construction of Alternative #3 (Preferred).

Table 1 summarizes the level of compliance of Alternative #3 (Preferred) with environmental protection statutes and other environmental regulations. Based on the evaluation of environmental impacts described in Section 4, there are no significant impacts from the Alternative #3 (Preferred), and a FONSI has been prepared.

Table 1. Compliance of Alternative #3 (Preferred) with Environmental Protection Statutes and Other Environmental Requirements

Federal Statutes, Executive Orders (EOs), and Memoranda	Level of Compliance
Archeological and Historic Preservation Act	Full
Bald and Golden Eagle Protection Act	Full
Chesapeake Bay Protection and Restoration (EO 13508)	Full
Clean Air Act	Full
Clean Water Act	Full
Comprehensive Environmental Response, Compensation and Liability Act	Full
Consultation and Coordination with Indian Tribal Governments (EO 13175)	Full
Endangered Species Act	Full
Farmland Protection Policy Act	Full

Federal Statutes, Executive Orders (EOs), and Memoranda	Level of Compliance
Floodplain Management (EO 11988)	Full
Fish and Wildlife Coordination Act	Full
Migratory Birds Act (EO 13186)	Full
National Historic Preservation Act	Full
National Environmental Policy Act	Partial ¹
Noise Control Act of 1972	Full
Protection of Wetlands (EO 11990)	Full
Protection of Children from Environmental Health Risks and Safety Risks (EO 13045)	Full
Prime and Unique Farmlands (Memorandum, 11 August 1980)	Full
Watershed Protection and Flood Prevention Act	Full
Wild and Scenic Rivers Act	N/A

¹Partial until a signed FONSI is received.

6 Required Coordination

6.1 Agencies Contacted

Direct coordination was completed with the USACE Baltimore District, PHMC, Pennsylvania PNDI agencies, Delaware Nation, Delaware Tribe of Indians, Shawnee Tribe, and the Tuscarora Nation. Agency correspondence is included in Attachment B.

6.2 Public Review and Comments

A public notice of availability will be posted by the NFS and be published for general circulation in Franklin County. The public will have 30 days to provide comments after the public notice is posted. The USACE will also post a public notice on the USACE Baltimore District public notice website. Additional coordination with the tribal nations will occur during the public review period.

7 Conclusion

The Marion Sewer Line Extension Project Alternative #3 (Preferred) would provide benefits to the area by supplanting the current on-lot septic systems and providing reliable wastewater removal and treatment for the residents and business of Marion, PA. No known projects contributing directly to population or economic growth are in construction at this time; however, Alternative #2 or Alternative #3 (Preferred) could encourage additional development of undeveloped or underdeveloped parcels within the service area. Current and future residents of Marion would benefit from the installation of a sanitary wastewater line to increase capacity for community and economic growth. Therefore, no known adverse impacts are expected at this time from implementation of Alternative #3 (Preferred).

8 List of Information Providers and Preparers

The following agencies were involved in preparation of the EA:

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