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Phone (512) 463-7847, Fax (512) 475-2053

FINDING OF NO SIGNIFICANT IMPACT

TO ALL INTERESTED AGENCIES AND PUBLIC GROUPS:

As required by the rules of the Texas Water Development Board (TWDB), 31 Texas Administrative Code (TAC) § 375.61 and 31 TAC § 363.14, an environmental review consistent with the National Environmental Policy Act (NEPA), 42 United States Code § 4321 *et seq.*, has been performed on the project below.

City of Mount Vernon, Franklin County, Texas
TWDB DFund Project No. 21832
Planning and Design for Water and Sewer Improvements
Wastewater Treatment Plant Improvements
Total Financing Amount: \$1,795,000
Loan No. L1001761

The City of Mount Vernon (City) is proposing to use \$1,795,000 in financing from the Texas Water Development Fund (DFund) program for planning and design phases of a project to replace wastewater collection lines, rehabilitate the wastewater treatment plant, replace the raw water main, and conduct waterline replacements within the City. The construction phase of the project will occur under two separate TWDB project numbers. Water components will be constructed under TWDB Project No. 21878 and were covered by a Determination of No Effect (DNE) issued January 23, 2026. Wastewater project components will be constructed under a different commitment; this Finding of No Significant Impact (FONSI) is issued for the wastewater components. The City originally received a commitment of Clean Water State Revolving Fund (CWSRF) Equivalency program funds under TWDB Project No. 73982 on March 31, 2026, for the construction phase of the project but withdrew the commitment prior to closing on the funding. The City will reapply for CWSRF funds at a later date.

The City proposes to use funding from the CWSRF program for the construction phase of the Wastewater Treatment Plant Improvements Project. Proposed wastewater project components assessed in this finding include the replacement of wastewater collection lines and the rehabilitation of the wastewater treatment plant.

An environmental review of the project consistent with NEPA has been completed following the guidelines provided in 31 TAC § 375.61 and is consistent with 31 TAC § 363.14. This environmental review is documented by the enclosed Environmental Assessment, which contains mitigative environmental conditions that will be applied to the project to avoid significant adverse environmental impacts on waters of the United States, wetlands, floodplains, cultural and historical resources, threatened and endangered species, and protected migratory bird species. Based on a detailed environmental review of the planning information, the Environmental Information Document, and other documentation, the project is environmentally sound with the following special and standard environmental conditions:

Our Mission	Board Members
Leading the state's efforts	L'Oreal Stepney, P.E., Chairwoman W. Brady Franks, Board Member Ashley Morgan, Board Member
in ensuring a secure	
water future for Texas	Bryan McMath, Executive Administrator

Special Environmental Conditions

- Consistent with the Flood Insurance Reform Act of 2004, federal Executive Order 11988 as amended by EO 13690, Texas Water Code Section 16.315, and local floodplain development ordinances, a floodplain development permit will be obtained from the local floodplain administrator prior to construction in Franklin County and Texas Water Development Board (TWDB) approval of plans and specifications, and any requirements contained therein will be adhered to.
- As per an agreement with the Texas Parks and Wildlife Department (TPWD), Ecological & Environmental Planning Program (TPWD Project No. 57076) to ensure compliance with Chapters 12, 57, 64, and 67 of the Texas Parks and Wildlife Code, the Endangered Species Act of 1973, as amended, the Migratory Bird Treaty Act, and applicable federal regulations pertaining to protected species, the following measures will be implemented:
 - Vegetation clearing must be excluded during the general bird nesting season, March 15 through September 15, to avoid adverse impacts to breeding birds. If vegetation clearing during this time is unavoidable, the area proposed for disturbance will be surveyed by a qualified biologist to identify occupied nests, not more than five days prior to clearing activities. If occupied nests are observed during surveys, a vegetation buffer area of no less than 100 feet in diameter will remain around the nest until all young have fledged; however, the size of the buffer zone depends on various factors and can be coordinated with the local or regional United States Fish and Wildlife Service (USFWS) office.
 - The length of trenches left open at any given time during construction will be minimized. Trenching and backfilling activities will be kept close together in time. Trenches and excavation areas will be covered overnight and/or inspected every morning or if left open longer than two daylight hours to ensure no wildlife species have been trapped. If trenches cannot be backfilled the day of initial trenching, then escape ramps will be installed every 300 feet, in the form of short lateral trenches or wooden planks sloping to the surface at an angle of less than 45 degrees, at a ratio one horizontal foot for every one foot of depth.
 - For soil stabilization and revegetation, no-till drilling, hydromulching (avoiding plastic ingredients), and/or hydroseeding will be used rather than erosion control blankets or mats, which pose an entanglement hazard to wildlife. If erosion control blankets or mats cannot be avoided, products that contain no netting or loosely woven natural fiber netting will be used, avoiding any type of plastic netting.
 - A Storm Water Pollution Prevention Plan (SWPPP) will be prepared and implemented to eliminate sediment in stormwater runoff from the construction areas, to include best management practices (BMPs) such as silt fences, hay bales, fiber logs, and berms.
 - Project sites will be restored to pre-existing elevations and conditions.

Standard Environmental Conditions

- Consistent with the TWDB Supplemental Construction Contract Conditions, the City of Mount Vernon (City) will abide by the standard emergency condition for the discovery of cultural resources.
- Consistent with the TWDB Supplemental Construction Contract Conditions, the City will abide by the standard emergency condition for the discovery of threatened and endangered species.

Therefore, it is recommended that a Finding of No Significant Impact be issued.

Documentation supporting this decision is on file in the office of the Regional Water Project Development, TWDB, and is available for public review upon request. Comments supporting or disagreeing with this preliminary environmental determination may be submitted to the Director, Regional Water Project Development, Texas Water Development Board, P.O. Box 13231, Austin, Texas 78711-3231 or via email at RWPD-Environmental@twdb.texas.gov. After evaluating the comments received, the Executive Administrator will make a final determination. However, no action regarding the provision of federal financial assistance for the project will be taken for at least thirty (30) calendar days after the release of this FONSI.

Sincerely,

Clay Schultz Digitally signed by Clay Schultz
Date: 2026.10.02 12:37:26 -05'00'

T. Clay Schultz, Ph.D., Director
Regional Water Project Development

Enclosures



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Mount Vernon, Franklin County, Texas
Texas Water Development Fund Project No. 21832
Planning and Design for Water and Sewer Improvements
Wastewater Treatment Plant Improvements
Environmental Assessment

REVIEW PROCESS

As described below, Texas Water Development Board (TWDB) has performed a review consistent with the 31 Texas Administrative Code (TAC) § 375.61 and the National Environmental Policy Act (NEPA), 42 U.S. Code § 4321 *et seq.* Consistent with 31 TAC § 375.65, the Environmental Information Document (EID) ¹ for the Planning and Design for Water and Sewer Improvements Project, Wastewater Treatment Plant Improvements proposed by the City of Mount Vernon (City) was reviewed by TWDB for the development of this Environmental Assessment. This project is financed through Texas Water Development Fund (DFund) program, which is administered by the TWDB. The City proposes to use funding from the CWSRF program for the construction phase of the Wastewater Treatment Plant Improvements Project.

PURPOSE AND NEED

The City provides sanitary sewer service to approximately 1,238 connections inside a 4.4 square mile service area in Franklin County. The collection system consists of three lift stations, 4-inch and 6-inch force mains, and clay and PVC gravity collection lines ranging in size from 6 to 12 inches in diameter. Wastewater collected in the system flows north to the existing activated sludge wastewater treatment plant (WWTP) where it is treated before being discharged into Town Branch creek. The WWTP is located north of downtown Mount Vernon. The original plant was designed and constructed in 1976 and included most of the elements that are still in use. Additional improvements were made in 1998 including the addition of a sludge digester, rerouting of primary influent into the headworks, and the construction of additional pump stations before and after the oxidation ditch. Existing treatment units include an influent lift station, mechanical screen, grit chamber, aeration basin, two final clarifiers, chlorine contact chamber, sludge digester, volute dewatering press, and multiple pump stations.

According to a *2023 Wastewater Collection System Analysis*, the estimated peak flow into the treatment plant is 1,155,132 gallons per day (gpd) or 1.15 million gallons per day (MGD) which exceeds non-excessive infiltration and inflow (I/I) as defined by the Texas Commission on Environmental Quality (TCEQ). For comparison, the WWTP's permitted peak two-hour flow is

¹ City of Mount Vernon (August 2026). Environmental Information Document (EID) (TWDB Form 0801). Prepared by Hydrex Environmental. Received by TWDB on March 4, 2026, The EID is complete with the supplementary materials submitted to the TWDB on August 3, 2026.

1.27 MGD, and the permitted average daily flow is 0.425 MGD. On June 16, 2021, the City received a TCEQ Notice of Enforcement letter concerning alleged effluent limit exceedances for total ammonia nitrogen in September and October of 2020 and failure to collect E. Coli data in October of 2020. Over the past three years, 75 percent of the daily average flow has been surpassed nine times with two of these being consecutive months, thereby coming close to violating the 75/90 percent permitted rule requirements. Exceeding 75 percent of permitted flow for three consecutive months triggers the need to initiate engineering and financial planning for expansion.

Although the collection system is adequately sized, it was determined that many of the old clay sewer pipes and brick manholes were failing. Improvements recommended for construction include: replacement of existing aged and deteriorating sewer lines, aging brick manholes, and installation of new sanitary sewer lines. Maintenance of existing sanitary infrastructure is crucial to the operation of the system. These aging pipes and manholes can collapse, clogging the system and reducing system capacities causing the sewer upstream to back up into houses and businesses. Replacement of aging sewer lines and manholes will reduce I/I and potential interruptions in service caused by collapsed manholes and clogged sewer lines. The reduction of I/I will also allow for more effective and efficient treatment at the WWTP by limiting the effects of peak flow occurrences caused by wet weather events. Additionally, the recommended improvements to the existing WWTP will address the effluent violations noted above. These proposed improvements are designed to accommodate future growth of the City as predicted by the TWDB 2021 Regional Water Plan and meet future anticipated effluent limitations required by the TCEQ.

PROJECT DESCRIPTION

The proposed project would replace wastewater collection pipelines within the city and expand the footprint and capacity of the City's existing WWTP. Collection system improvements will include the replacement of approximately 7,500 linear feet (LF) of 6-inch wastewater pipeline and thirty manholes as the base bid. An additional 4,500 LF of 8-inch wastewater line and fourteen manholes will be considered as a bid alternate that is only to be constructed if the funds are available. Most pipeline replacements will be conducted using pipe bursting, except for where the line will be bored under the railroad track.

WWTP improvements include the removal and replacement of existing aerators with new energy-efficient aerators, construction of a 40-foot diameter final clarifier, construction of tertiary treatment improvements, chlorine contact chamber modifications, and installation of a water-saving, non-potable water reuse system for the treatment plant. If the construction budget allows, replacement of the existing grit removal system and influent lift station equipment at the WWTP will be included as a part of the project.

Collection system improvements would include replacement of existing brick manholes and various portions of clay sewer pipes using pipe bursting, open cutting, and dry bores to reduce inflow and infiltration and interruption of service. The locations and methods of installation for the sanitary sewer collection system improvements are as follows:

Collection System – North (Approx. 7,500 LF)

1. Gregg Street: open cut and pipe bursting
2. Keith Street: open cut and pipe bursting
3. Kaufman Street: open cut
4. Leftwich Street: open cut and pipe bursting
5. Main Street: pipe bursting and dry bore
6. Miller Street: open cut, pipe bursting, and dry bore of railroad
7. Pecan: open cut
8. Turner Street: open cut and pipe bursting
9. Yates Street: open cut and pipe bursting

Collection System – South (Approx. 4,500 LF)

10. Interstate 30 Frontage Road: open cut, pipe bursting, and wet bore

Many of these existing lines are located within residential street easements. The use of pipe bursting should allow construction activities to occur during normal work hours from 8:00 AM to 5:00 PM in order to minimize road closures and allow resident access in the mornings and evenings. The existing lines are to be replaced with new 6-inch and 8-inch PVC sanitary sewer pipe and new 48-inch pre-cast concrete manholes. All line improvements will be constructed either in place of or adjacent to existing lines, with the exception of two locations where the route is being made more efficient. New easements will be acquired for these new line installations, while the old lines will be plugged and abandoned in place. This new pipe will be extended from Miller Street north from its intersection with Keith Street, and will be installed via boring under the railroad, as indicated in item number 6, above. The bore pits will be located outside of tree cover to minimize disturbance to the natural environment. The second location where easements will be necessary is within the 'Collection System – South' portion of the line installations, as indicated in item number 10 above. Here, boring will be used to avoid limiting access to and disturbing existing parking lots and driveways.

The proposed project components assessed in this environmental assessment include:

- Replacement of approximately 9,800 LF of existing 6-inch wastewater collection pipelines and 30 manholes
- Installation of approximately 2,200 LF of new 6-inch wastewater collection pipelines and five new manholes
- Rehabilitation and expansion of the WWTP from 1.27 million gallons per day (MGD) to 2.2 MGD
 - Removal of existing aerators and installation of new energy-efficient aerators
 - Construction and installation of 40-foot diameter clarifier
 - Construction and installation of tertiary cloth filter facility
 - Installation of chlorine contact chamber
 - Installation of water-saving, non-potable water reuse system, including 3,000 LF of yard piping
 - Replacement of existing grit removal system and influent lift station equipment
 - Fenceline replacement and expansion

PROJECT FUNDING

To address these issues, the City applied to the TWDB for financing through the CWSRF program for the construction phase of the project. On March 31, 2026, the TWDB committed funds for the project. The City elected to withdraw the CWSRF funding prior to closing and will reapply at a later date. On April 11, 2024, the TWDB committed \$1,795,000 in financing from the DFund Program for planning and design to replace wastewater collection lines, rehabilitate the wastewater treatment plant, replace the raw water main, and conduct waterline replacements, and the City closed on the funding on August 12, 2024. Some of the planning funds were used to assess the potential environmental impact of the project and prepare an Environmental Information Document (EID). Preparation of the EID involved consultation with state and federal regulatory agencies and additional public participation.

The TWDB may not fund testing, remediation, removal, disposal, or related works for contaminated or potentially contaminated materials. However, the project proponent should ensure that, if found, such materials are tested, removed, and disposed of in accordance with applicable state and federal laws.

EVALUATION OF ALTERNATIVES

In addition to the Preferred Alternative, the City evaluated the No-Action Alternative and one Alternative Not Selected. Each alternative was evaluated for its potential direct, secondary, and cumulative impacts on the existing environment.

No-Action Alternative

The No-Action Alternative would have less impact than the Preferred Alternative in terms of land cover change and habitat removal and a potentially greater impact due to poor water quality if improvements are not made to the WWTP.

The No-Action Alternative could negatively affect the ability of the WWTP to maintain TCEQ compliance, leading to continued periodic contamination of surface water and potential fines and enforcement action by TCEQ. If no changes are made, local homes and businesses will periodically experience sewage backup posing a health risk to the public. In comparison, the Preferred Alternative will bring the City into compliance with TCEQ, protect surface water quality and prevent sewage backup into homes and businesses.

Alternative Not Selected

The alternative considered for the collection system includes replacement of all of the existing sewer lines by open cutting/trenching instead of pipe bursting. Pipe bursting is a trenchless sewer repair method that involves breaking and expanding the existing buried sewer line while simultaneously replacing it with new high-density polyethylene (HDPE) pipes. The open cut method would include the excavation of pavement and soil substrate, removal of existing sewer lines and manholes, replacing with HDPE pipes and constructing new manholes, and then covering and paving over the trenches and connections.

The WWTP alternative considered consists of additional equipment upgrades and system replacements (e.g. sludge digester system). All improvements would take place within the current footprint and the 0.41-acre proposed expansion area.

The goals of the collection system improvements would be achieved as the aged and failing lines and manholes would be replaced. However, exclusively using the open cut method of replacement would cause temporary negative surface impacts due to excavation within and nearby roadways and would require significant pavement repair. This method disrupts the public and has the potential to significantly hinder road traffic during construction. Although the Preferred Alternative would utilize open cut methodology in a few locations, the majority of the replacements would be conducted via pipe bursting which would isolate the temporary negative impacts to fewer locations.

Similarly, the goals of the WWTP improvements would be achieved (i.e., maintain TCEQ compliance, eliminate surface water contamination and degradation of downstream habitat, etc.) and result in long-term benefits to the environment and community. These benefits are comparable to those of the Preferred Alternative.

Preferred Alternative

The Preferred Alternative is described in the Project Description section above. The purpose of the preferred alternative is to provide a more reliable wastewater system for the city, which the No-Action Alternative would not provide.

ENVIRONMENTAL REVIEW

Consistent with the requirements of the federally funded CWSRF Program, the City defined the social and environmental contexts of the project and assessed its potential impact. This information was presented in the EID and was made available to the community, regulatory agencies, and other interested parties.

Adverse effects on social and natural resources fall under the authority of various agencies. These regulatory agencies and participating area residents had the opportunity to address potential issues concerning construction practices, possible adverse effects within the project area, and the environmental conditions to be implemented during construction. The staff of the TWDB reviewed the EID, comments and other data, and prepared the present EA.

AFFECTED ENVIRONMENT AND IMPACT ASSESSMENT

Land Use

The proposed project would be constructed in the City of Mount Vernon and County of Franklin and would serve the population of Mount Vernon. The project is located in the center of Franklin County, approximately 90 miles northeast of Dallas, Texas.

The majority of wastewater pipeline replacements would be located within residential, commercial areas in the city, parallel to existing roadways and waterlines within existing city easements. Approximately 500 LF of line replacements will occur in an undeveloped area that crosses forest along a railroad.

The WWTP is located just north of Mount Vernon city limits which was originally constructed in and is surrounded by riparian forest of the Town Branch stream. The proposed WWTP expansion will largely involve the replacement of existing equipment and facilities. The installation of a 40-foot diameter clarifier and a cloth media filter facility requires an approximate 0.41-acre expansion area, which represents a permanent conversion of forest to developed land. A new fence will be established around this area.

Easements will be acquired for the new portions of the proposed lines that will not be located within existing easements. Construction will take place within permanent utility easements extended by temporary construction easements ranging from 10 to 40 feet. There will be temporary negative impacts on home and business access. These impacts are temporary by nature and will be minimal due to the majority of line replacements being conducted via pipe bursting. There will be no adverse or beneficial permanent impacts on land use from the collection system improvements.

Geology and Soils

The project is located within the Gulf Coastal Plains Physiographic Province of Texas, Blackland Prairie subprovince. According to Wermund (1996), "on the Blackland Prairies of the innermost Gulf Coastal Plains, chalks and marls weather to deep, black, fertile clay soils, in contrast with the thin red and tan sandy and clay soils of the Interior Gulf Coastal Plains. The blacklands have a gentle undulating surface, cleared of most natural vegetation and cultivated for crops."² Geologically, the project is underlain by mostly Eocene and Paleocene-age formations with some

Cretaceous rocks to the north. The underlying geologic formations include the Wilcox Group – undivided and the Midway group – undivided. The Wilcox group is of Paleocene to Eocene age and consists of mostly mudstone, with various amounts of sandstone, lignite, ironstone concretions, and glauconite with a total thickness of roughly 426 to 548 meters (1,400 to 1,800 feet). The Midway Group consists of clay with silty and sandy aspects in poorly bedded layers which grade up to mudstone in the upper components and has a total thickness of 45 meters (150 feet).

There are no faults or other pertinent geologic features mapped in the project area. The project is not located in a karst or pseudo-karst zone. No direct impacts to geology are anticipated.

The proposed wastewater line construction will impact approximately 1.7 acres of soils designated as prime farmland as defined by the United States Department of Agricultural – Natural Resources Conservation Service (USDA-NRCS). The proposed WWTP site does not

² Wermund, E.G. (1996). "Physiography of Texas." Bureau of Economic Geology, the University of Texas at Austin.

contain prime farmlands. Soil will not be moved off site and will not be contaminated as a result of the project.

Water Resources

The project is located in the United States Geological Survey (USGS) hydrologic unit Code (HUC) 06 Big Cypress - Sulphur River Basin. The source of the City's water supply is from surface water, Lake Cypress. The project site is underlain by the Carrizo major. There are no Environmental Protection Agency (EPA) designated sole source aquifers in the project area. This project would not increase the capacity of the City's water systems or permanently impact the availability or safety of the local water supply.

The proposed collection system and WWTP improvements will help reduce inflow/infiltration of runoff and groundwater into the collection system, which will allow wastewater to be collected and treated more efficiently. This will reduce the amount of inadequately treated effluent discharged into Town Branch Creek.

The project does not involve significant impacts to water quality. Temporary impacts associated with project construction are possible. The proposed project would discharge into Town Branch, which does not have any currently listed impairments.

Wastewater effluent discharge can alter the biological and chemical composition of receiving waters through temperature fluctuations, the input of nutrients and emerging contaminants, and the alteration of streamflow. However, WWTPs are generally accepted as the preferred method of waste management to improve water quality over on-site sewage facilities (OSSF) that may impact waterbodies to a greater degree due to unregulated sewage from OSSFs leaking into surface and groundwater.

An amendment to the TCEQ discharge permit will be required for this project (TPDES Permit No. WQ0011122002). A draft permit was issued by TCEQ on January 27, 2026, to renew the existing Texas Pollutant Discharge Elimination System (TPDES) permit that authorizes the discharge of treated domestic wastewater at a daily average flow not to exceed 0.425 MGD and a two-hour peak flow rate not to exceed 885 gallons per minute (gpm) or 1.274 MGD.

Temporary surface water runoff impacts are expected during construction. A National Pollutant Discharge Elimination System (NPDES) permit will be acquired and a Stormwater Pollution Prevention Plan (SWPPP) will be implemented by the contractor with erosion control best management practices (BMPs) in place prior to construction. The BMPs will act to minimize dust, sedimentation, erosion, and pollution to surface waters.

Topography and Floodplains

Elevation across the project area ranges from approximately 410 to 425 feet above mean sea level. The topography of the project area is generally more level and gently rolling compared to the more dissected and irregular topography of areas to the south. The project area is generally level with gently rolling hills, and drains north to White Oak Creek, a tributary of the Sulphur River.

Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) indicate that pipeline construction will not occur within a Special Flood Hazard Area, including the 100-year floodplain. FIRM maps were not available for Franklin County, where the WWTP is located. Because the WWTP is located near the intersection of two streams, Hydrex Environmental prepared a flood risk assessment to determine whether proposed project work would occur in the floodplain. The assessment found that the flood elevations for the 1 percent and 0.2 percent chance flood events were lower than various points at the WWTP site. Additionally, a map was created using FEMA estimated base flood elevation data showing that project components at the WWTP site were not in the 500- or 100-year floodplains. No temporary or permanent impacts to the floodplain or floodway will occur because of the project. Both the City and Franklin County participate in the National Flood Insurance Program (NFIP). Because Franklin County is unmapped by FEMA FIRMs, a floodplain permit is required for all construction in the county and one will be required to be submitted to the TWDB prior to approval of plans and specifications.

Wetlands, Streams, and Waters of the United States

The northern wastewater line replacements and the WWTP are located within the HUC 10 Lower White Oak Creek watershed while the southern wastewater line replacement is located in the Upper White Oak Creek HUC 10 watershed. Town Branch Creek is located immediately east, adjacent to the WWTP site. The WWTP discharges into a tributary of Town Branch Creek immediately north of the WWTP site. This project does not propose work at the WWTP's existing outfall. Additionally, no waterbodies will be intersected by pipeline installation. Therefore, the project will not adversely impact waters of the United States, including wetlands.

Biological Elements

The project area is located within the EPA Level III East Central Texas Plains Ecological Region and Level IV Northern Post Oak Savannah Ecoregion. A biological assessment³ report was prepared on October 10, 2025, based on a site visit conducted on July 15, 2025. The habitat types within the proposed project areas identified in the report included upland grass lawn, an upland forested area, and areas of urban development. The upland grass lawn is dominated by Bermudagrass (*Cynodon dactylon*), St. Augustine grass (*Stenotaphrum secundatum*), and crabgrass (*Digitaria sanguinalis*). Primary vegetation within the upland forested area includes American elm (*Ulmus americana*), sugarberry (*Celtis laevigata*), Chinese privet (*Ligustrum sinense*) and eastern poison ivy (*Toxicodendron radicans*). No tree removal will be required as part of project construction.

Databases of sensitive species maintained by the United States Fish and Wildlife Service (USFWS) and Texas Parks and Wildlife Department (TPWD) were reviewed to verify any state and/or federally listed threatened or endangered species that occur, or have historically occurred, in Franklin County.

³ City of Mount Vernon (October 10, 2025). Threatened and Endangered Species Habitat Evaluation, City of Mount Vernon Collection System and Wastewater Treatment Plant Improvements, prepared by Hydrex Environmental for KSA Engineers, Inc.

No known occurrences of or potential habitat for federally listed candidate, threatened, or endangered species were present within or adjacent to the project area during the field survey. There was no designated critical habitat within the project area.

No state or national parks, forests, wildlife refuges, wild or scenic rivers, or natural areas or similar preserves are located within the project area.

Cultural Resources

A cultural resources survey⁴ was performed under Texas Antiquities Permit No. 32588. A review of the Texas Archeological Sites Atlas and the National Register of Historic Places (NRHP) Inventory for Franklin County within the survey report found that there were no previously recorded archaeological sites within the one-mile review area of the project. The field investigation found no archaeological artifacts, sites, or features on the ground surface or in subsurface contexts during the pedestrian survey at any of the survey areas. No archaeological materials were present within auger tests. Additionally, no structures over 45 years were present within the visual effects buffer surrounding the WWTP. The report recommended a finding of *no historic properties affected*. However, upon review of the report by the Texas Historical Commission (THC), they found that a portion of the Mount Vernon Downtown Historic District, listed in the NRHP, was located in the area of potential effects (APE) for the proposed project, though the project site was located outside of the historic district's boundary. The THC's review concluded that the proposed project would have no adverse effect on above ground historic properties.

Hazardous Materials

There are no Superfund Sites from the EPA National Priorities List located on the proposed subject property or in areas associated with the proposed project. A Phase I Environmental Site Assessment has not been conducted. The TWDB does not fund the testing, remediation, removal, disposal, or related work for contaminated or potentially contaminated materials.

Socioeconomics

A socioeconomic analysis was performed on March 4, 2026, within a 0.5-mile radius of the project area using data from the United States Census, American Community Survey 5-year estimates for 2024. Data include the population, percentage of minority residents, percent low income, and per capita income for the project area, for comparison with data for the county and state.

⁴ Welch, Danny (January 16, 2026). Cultural Resources Assessment of the Mount Vernon TWDB Clean Water Project, Franklin County, Texas. Prepared for Hydrex Environmental on behalf of the City of Mount Vernon. Texas Antiquities Permit No. 32588/THC No. 202604975.

Area	Population	Percent Minority	Percent Below Poverty Level	Per Capita Income
State of Texas	31,290,831	61.3	13.4	\$40,752
Franklin County	10,912	24.5	13.4	\$41,630
Mount Vernon	2,548	53.1	10.7	\$33,570
Project Area (0.5-mile buffer)	2,548	53.1	10.7	\$33,570

The socioeconomic analysis indicates that the area within 0.5 mile of the project (the same area as the City) has a minority population that is greater than that of Franklin County but lower than the State of Texas overall. The percent of the population below the poverty level is less in the City than in the County or the State. The per capita income of the City is less than that of the County or State.

An increase in utility rates and taxes is not anticipated. People or businesses will not be relocated as a result of the project and eminent domain will not be required. The entire population of this project area will be the recipients of benefits derived from the proposed improvements. Therefore, the project will not disproportionately, adversely affect minority or low-income populations.

Secondary and Cumulative Impacts

Temporary increases in air emissions will occur from construction machinery due to the proposed project; however, air quality will not be adversely impacted in the project vicinity after construction is complete.

Past projects including the construction of the existing WWTP, sewer and/or water line construction, and road construction projects may have impacted the same resources. Future projects including improvements to the WWTP, water/sewer line construction projects, and road construction projects also may impact the same resources.

The project is not anticipated to change the projected rate, density, or type of development in the vicinity of the project area. The land use in surrounding areas will generally remain in its current land uses following the construction of the project.

AGENCY COORDINATION AND COMPLIANCE

To ensure due consideration of the project's potential impact, the City prepared an EID describing the results of that investigation, held an open meeting to familiarize the community with the project and solicit public comment, and coordinated with all required regulatory agencies and other interested parties to define and avoid, minimize, or mitigate adverse effects. The City has provided assurance that environmental conditions will be implemented in a manner consistent with the requirements of state and federal regulatory agencies and rules of the TWDB.

“Cross-Cutter” Compliance

The project has been reviewed for potential impacts to the quality of the environment following the procedures provided in 31 TAC § 375.61 and 31 TAC § 363.14, to ensure compliance with CWSRF and DFund program requirements and federal and state regulations, including the federal cross-cutting environmental authorities from the EPA listed below.

- (1) National Environmental Policy Act of 1969, Public Law (PL) 91-190
- (2) Archeological and Historic Preservation Act of 1974, PL 93-291
- (3) Clean Air Act, 42 USC 7506(c)
- (4) Coastal Barrier Resources Act, 16 USC 3501 *et seq.*
- (5) Coastal Zone Management Act of 1972, PL 92-583, as amended
- (6) Endangered Species Act, 16 USC 1531, *et seq.*
- (7) Executive Order 11593, Protection and Enhancement of the Cultural Environment
- (8) Executive Order 11988, Floodplain Management, as amended by Executive Order 12148
- (9) Executive Order 11990, Protection of Wetlands
- (10) Farmland Protection Policy Act, 7 USC 4201, *et seq.*
- (11) Fish and Wildlife Coordination Act, PL 85-624, as amended
- (12) National Historic Preservation Act of 1966, PL 89-665, as amended
- (13) Safe Drinking Water Act, § 1424(e), PL 92-523, as amended
- (14) Wild and Scenic Rivers Act, PL 90-542, as amended
- (15) The Wilderness Act, 16 USC 1131, *et seq.*
- (17) Flood Insurance Reform Act of 2004, PL 108-264
- (18) National Flood Insurance Reform Act of 1994, PL 103-325
- (19) Flood Disaster Protection Act of 1973, as amended, PL 93-234
- (20) Clean Water Act, PL 92-500, as amended

Agency Coordination

This environmental review included coordination with various state and federal regulatory agencies, local authorities, and other stakeholders and interested parties regarding the project's potential impact. The City submitted notifications to and requests for input from all required parties. Some entities did not require a response. The respondents are listed below, and the results of coordination are summarized in the EID and reflected in the environmental conditions.

- Texas Historical Commission, State Historic Preservation Officer, Austin in accordance with Section 106 of the National Historic Preservation Act; Antiquities Code of Texas; and other applicable regulations (Texas Antiquities Permit No. 32588, THC Tracking No. 202604975)
- United States Army Corps of Engineers, Regulatory Branch, Fort Worth District, in accordance with Section 404 of the Clean Water Act; and Section 10 of the Rivers and Harbors Act of 1899 (Project No. SWF-2025-00489)
- Texas Parks and Wildlife Department, Wildlife Division, Ecological & Environmental Planning Program, Austin, in accordance with the Endangered Species Act of 1973, as amended; Migratory Bird Treaty Act; Texas Parks and Wildlife Code; and other applicable regulations (TPWD Project No. 57076)

- United States Fish and Wildlife Service, Arlington Ecological Services Field Office, in accordance with the Endangered Species Act and statutes affecting other federally protected species (USFWS Project Code 2025-0124200)
- United States Department of Agriculture, Natural Resources Conservation Service pursuant to the Farmland Protection Policy Act
- Texas Commission on Environmental Quality in accordance with 40 CFR Part 93 and National Ambient Air Quality Standards (TCEQ NEPA Request No. 2025-062)
- Local Floodplain Administrator, pursuant to the Flood Insurance Reform Act of 2004, federal Executive Order 11988, Texas Water Code Section 16.315, and local floodplain development ordinances

No response was required from the following entities:

- Bureau of Reclamation, Oklahoma-Texas Area Office
- Bureau of Land Management
- Local government (County Judge)

Texas Historical Commission

The cultural resources survey report was reviewed by the THC staff in accordance with Section 106 of the NHPA and the Antiquities Code of Texas. The THC staff concurred with City in correspondence dated February 18, 2026, that no direct impacts to cultural resources/historic properties are anticipated as a result of the project (Texas Antiquities Permit No. 32588, THC Tracking No. 202604975). The THC found that a portion of the Mount Vernon Downtown Historic District, listed in the NRHP, was located in the APE for the proposed project, though the project site was located outside of the historic district's boundary. The THC's review concluded that the proposed project would have no adverse effect on above ground historic properties.

United States Army Corps of Engineers

The United States Army Corps of Engineers (USACE), Fort Worth District Office, Regulatory Branch staff were given the opportunity to review the project (USACE Project Number SWF-2025-00489). Hydrex Environmental, on behalf of the City, conducted a pre-application meeting with the USACE and communicated that there would be no impacts to waterbodies in the project area. Meeting notes were confirmed by the USACE in communications dated October 29, 2025. Therefore, no further coordination was required.

Texas Parks and Wildlife Department

The TPWD Wildlife Division, Ecological & Environmental Planning Program staff reviewed the project in accordance with the Texas Parks and Wildlife Code, and provided a response dated November 3, 2025 (TPWD Project No. 57076). The TPWD staff made recommendations and in correspondence dated January 9, 2026, Hydrex Environmental, on behalf of the City, responded regarding their commitment to the recommendations. Recommendations related to migratory bird and species of greatest conservation need (SGCN) are reflected in the environmental conditions of this environmental finding.

United States Fish and Wildlife Service

The USFWS Arlington Ecological Services Field Office, in accordance with the Endangered Species Act and statutes affecting other federally protected species, was given the opportunity to review the project through the Information for Planning and Consultation (IPaC) system (Project Code No. 2025-01242000). The USFWS technical assistance letter dated September 25, 2025, issued a *No Effect* determination for the listed species in the project area and a formal Section 7 consultation was not required.

Texas Commission on Environmental Quality

In a response dated December 20, 2024, the TCEQ stated that a review of the proposed project for general conformity impact, in accordance with 40 CFR Part 93 and Title 30, TAC § 101.30, indicates that Franklin County is currently designated unclassified or in attainment of the National Ambient Air Quality Standards for all six criteria air pollutants (TCEQ NEPA Request No. 2025-062). Therefore, general conformity rules do not apply. The proposed project is in compliance with the State Implementation Plan and the Clean Air Act. The TCEQ further noted that significant long-term impacts are not anticipated.

United States Department of Agriculture – Natural Resource Conservation Service

As required by the Farmland Protection Policy Act (FPPA), the United States Department of Agriculture - Natural Resources Conservation Service (USDA-NRCS) reviewed the proposed project. In a response dated November 24, 2025, the USDA-NRCS determined that although the proposed site may contain areas of Prime Farmland, the location was considered to be “land committed to urban development” and is therefore exempt from the provisions of the FPPA.

PUBLIC PARTICIPATION

The project is consistent with local, regional, and statewide planning. Coordination with the appropriate governmental agencies has been made and no adverse comments have been received.

Public participation conducted during facilities planning included a public meeting held on Wednesday, December 19, 2025, which was advertised in the *Mount Pleasant Tribune*, a newspaper of general circulation in the service area. The notice was published on November 19, 2025, and contained information regarding availability of planning documents, including the EID, for public review at the Mount Vernon City Hall, Mount Vernon, Texas during normal business hours (8 a.m. to 4:30 p.m.).

The public meeting was held at 11 a.m. on December 19, 2025, at Mount Vernon City Hall. A total of five people attended the meeting, none of whom were members of the public and not part of the project team. No concerns or adverse comments were voiced at the public meeting or received during the 30-day public review period.

ENVIRONMENTAL CONDITIONS

An environmental review of the project consistent with NEPA has been completed following the guidelines provided in 31 TAC § 375.65 and 31 TAC § 363.14. Mitigation measures were defined through the agency coordination process and public participation and are listed below as applicable environmental conditions. These conditions will pertain to the project throughout construction and beyond as warranted. Based on information provided by the City, the proposed Wastewater Treatment Plant Improvements project is considered environmentally sound with the following special and standard environmental conditions:

Special Environmental Conditions

- Consistent with the Flood Insurance Reform Act of 2004, federal Executive Order 11988 as amended by EO 13690, Texas Water Code Section 16.315, and local floodplain development ordinances, a floodplain development permit will be obtained from the local floodplain administrator prior to construction in Franklin County and Texas Water Development Board (TWDB) approval of plans and specifications, and any requirements contained therein will be adhered to.
- As per an agreement with the Texas Parks and Wildlife Department (TPWD), Ecological & Environmental Planning Program (TPWD Project No. 57076) to ensure compliance with Chapters 12, 57, 64, and 67 of the Texas Parks and Wildlife Code, the Endangered Species Act of 1973, as amended, the Migratory Bird Treaty Act, and applicable federal regulations pertaining to protected species, the following measures will be implemented:
 - Vegetation clearing must be excluded during the general bird nesting season, March 15 through September 15, to avoid adverse impacts to breeding birds. If vegetation clearing during this time is unavoidable, the area proposed for disturbance will be surveyed by a qualified biologist to identify occupied nests, not more than five days prior to clearing activities. If occupied nests are observed during surveys, a vegetation buffer area of no less than 100 feet in diameter will remain around the nest until all young have fledged; however, the size of the buffer zone depends on various factors and can be coordinated with the local or regional United States Fish and Wildlife Service (USFWS) office.
 - The length of trenches left open at any given time during construction will be minimized. Trenching and backfilling activities will be kept close together in time. Trenches and excavation areas will be covered overnight and/or inspected every morning or if left open longer than two daylight hours to ensure no wildlife species have been trapped. If trenches cannot be backfilled the day of initial trenching, then escape ramps will be installed every 300 feet, in the form of short lateral trenches or wooden planks sloping to the surface at an angle of less than 45 degrees, at a ratio one horizontal foot for every one foot of depth.
 - For soil stabilization and revegetation, no-till drilling, hydromulching (avoiding plastic ingredients), and/or hydroseeding will be used rather than erosion control blankets or mats, which pose an entanglement hazard to wildlife. If erosion control blankets or mats cannot be avoided, products that contain no netting or

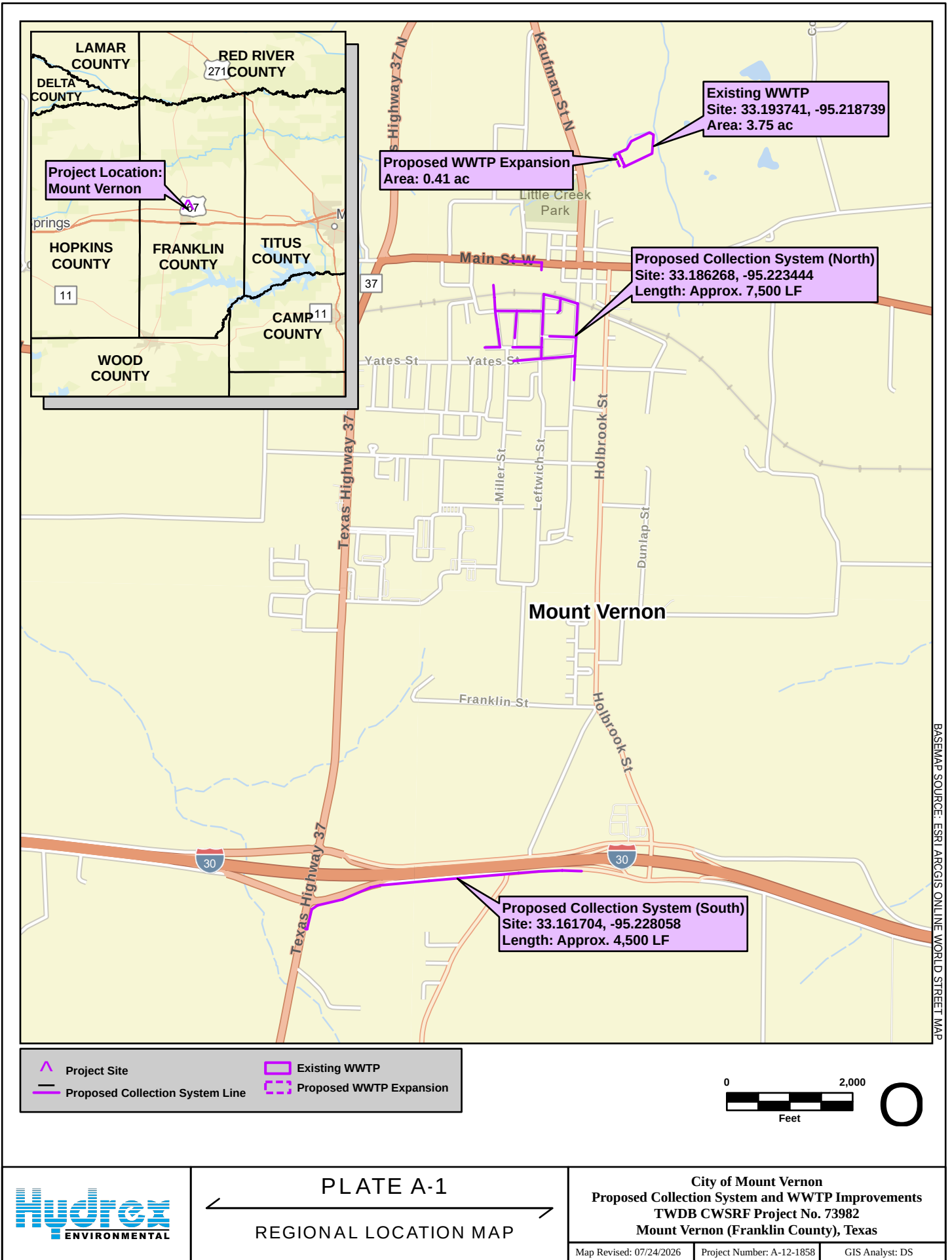
loosely woven natural fiber netting will be used, avoiding any type of plastic netting.

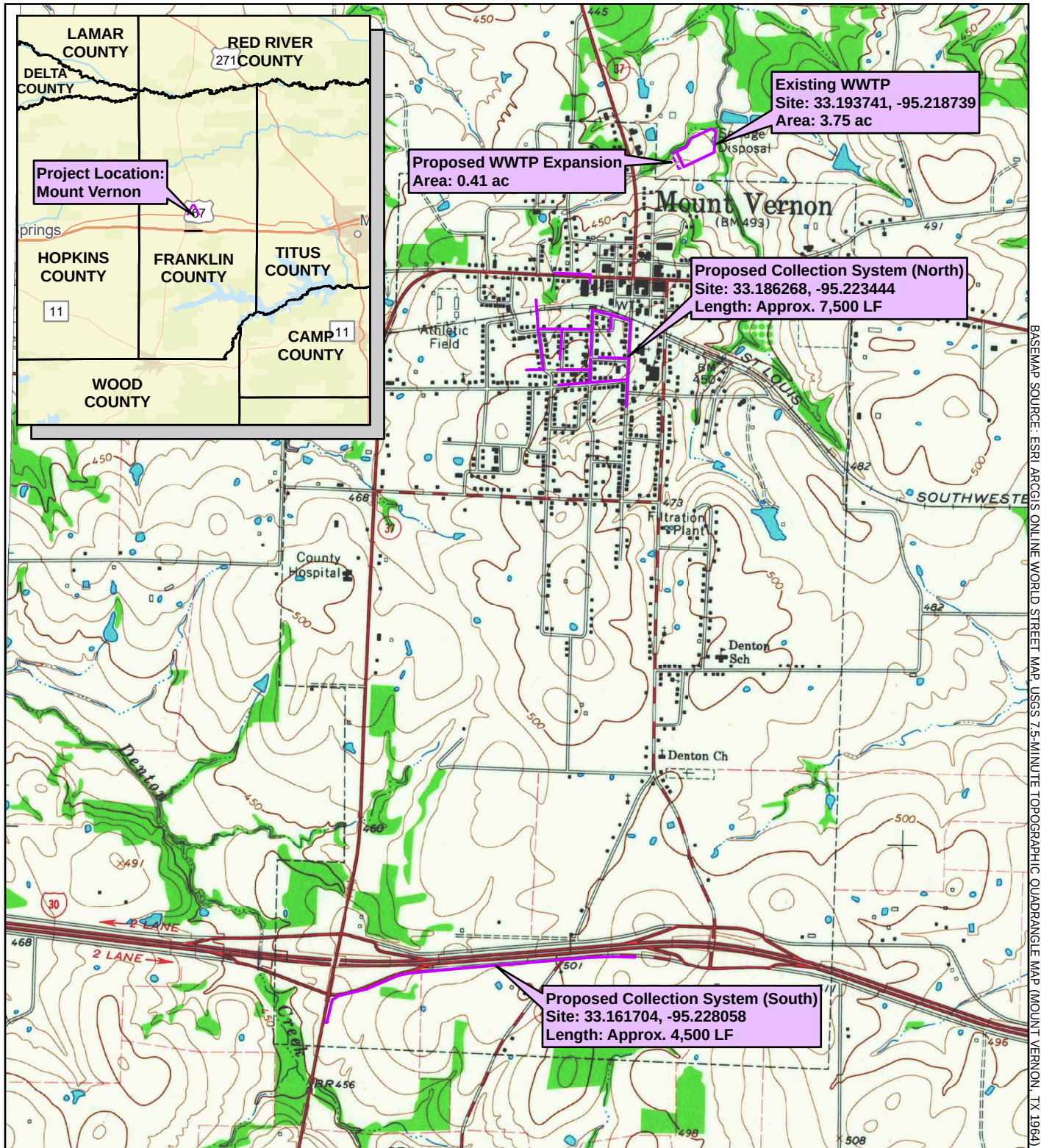
- A Storm Water Pollution Prevention Plan (SWPPP) will be prepared and implemented to eliminate sediment in stormwater runoff from the construction areas, to include best management practices (BMPs) such as silt fences, hay bales, fiber logs, and berms.
- Project sites will be restored to pre-existing elevations and conditions.

Standard Environmental Conditions

- Consistent with the TWDB Supplemental Construction Contract Conditions, the City of Mount Vernon (City) will abide by the standard emergency condition for the discovery of cultural resources.
- Consistent with the TWDB Supplemental Construction Contract Conditions, the City will abide by the standard emergency condition for the discovery of threatened and endangered species.

Therefore, it is recommended that a Finding of No Significant Impact be issued.





BASEMAP SOURCE: ESRI ARCGIS ONLINE WORLD STREET MAP USGS 7.5-MINUTE TOPOGRAPHIC QUADRANGLE MAP (MOUNT VERNON, TX 1964)

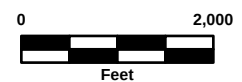
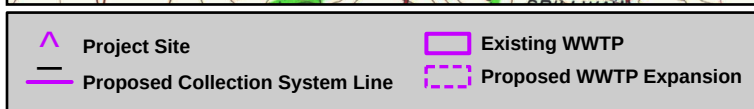


PLATE A-2

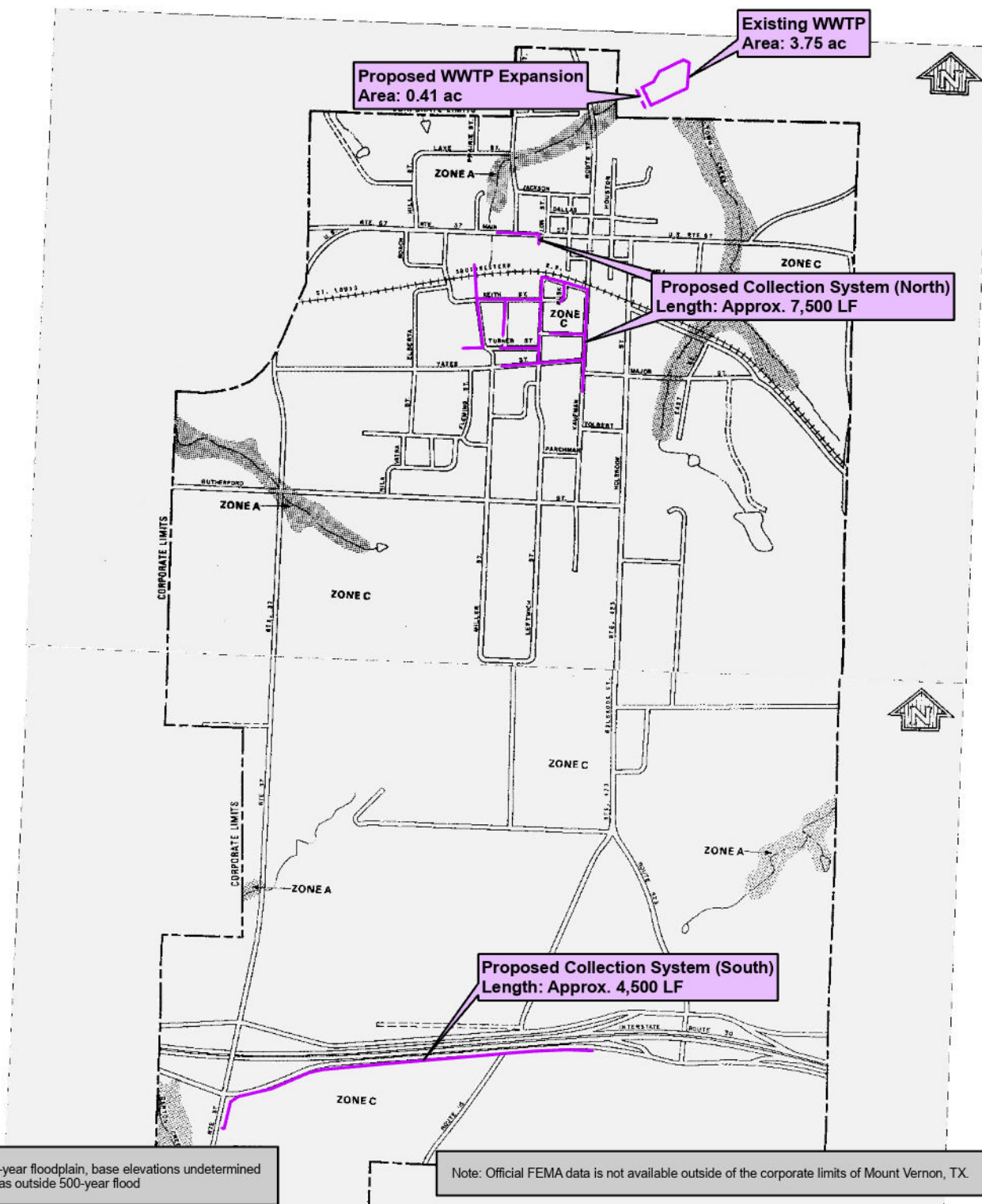
USGS TOPOGRAPHIC MAP

City of Mount Vernon
Proposed Collection System and WWTP Improvements
TWDB CWSRF Project No. 73982
Mount Vernon (Franklin County), Texas

Map Revised: 7/24/2026

Project Number: A-12-1858

GIS Analyst: DS



BASEMAP SOURCE: FLOOD DATA PROVIDED BY FEMA PANEL NUMBER: 480821A

Zone A - 100-year floodplain, base elevations undetermined
 Zone C - Areas outside 500-year flood

Note: Official FEMA data is not available outside of the corporate limits of Mount Vernon, TX.

Proposed Collection System Line

Existing WWTP

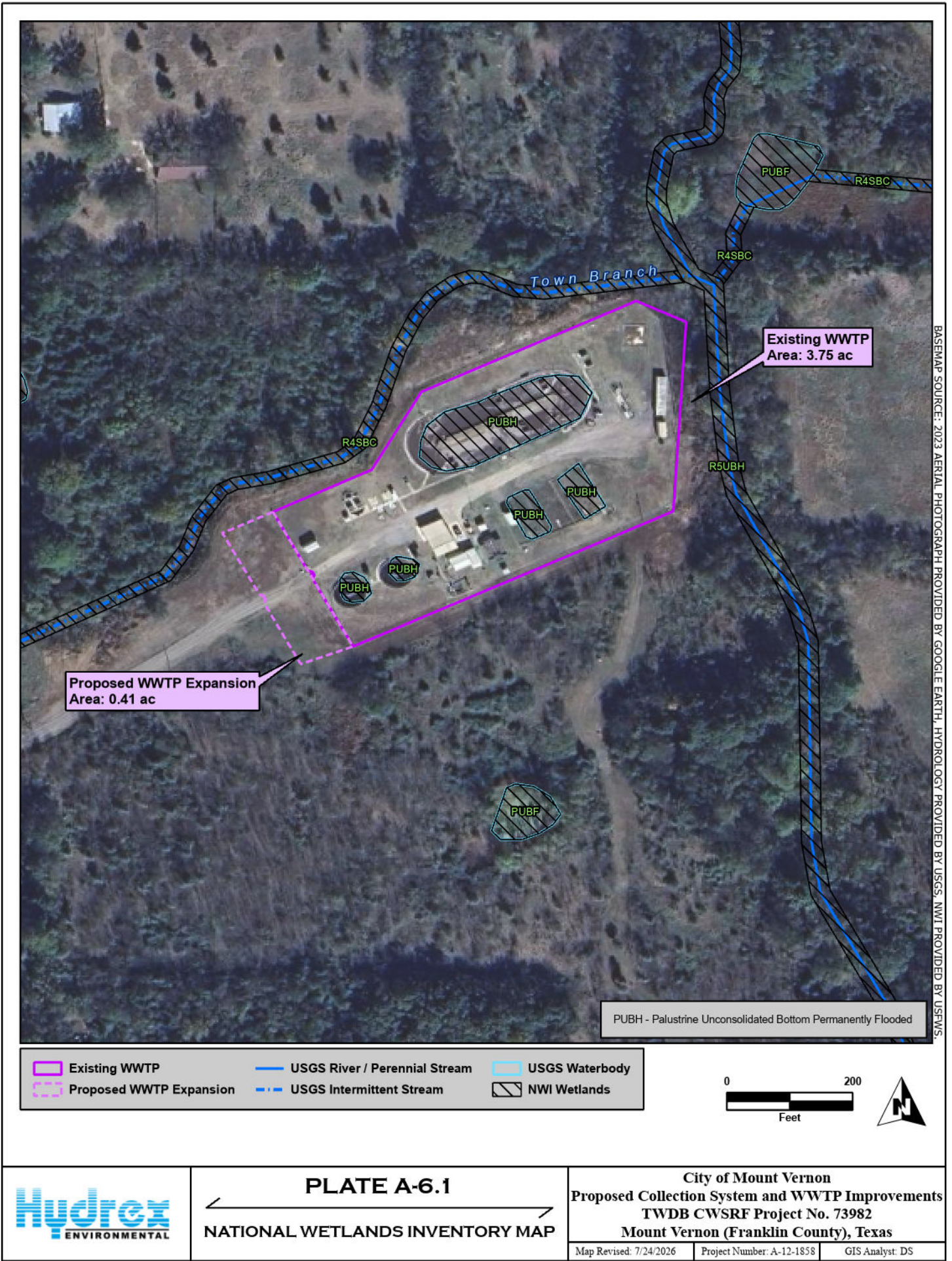
Proposed WWTP Expansion

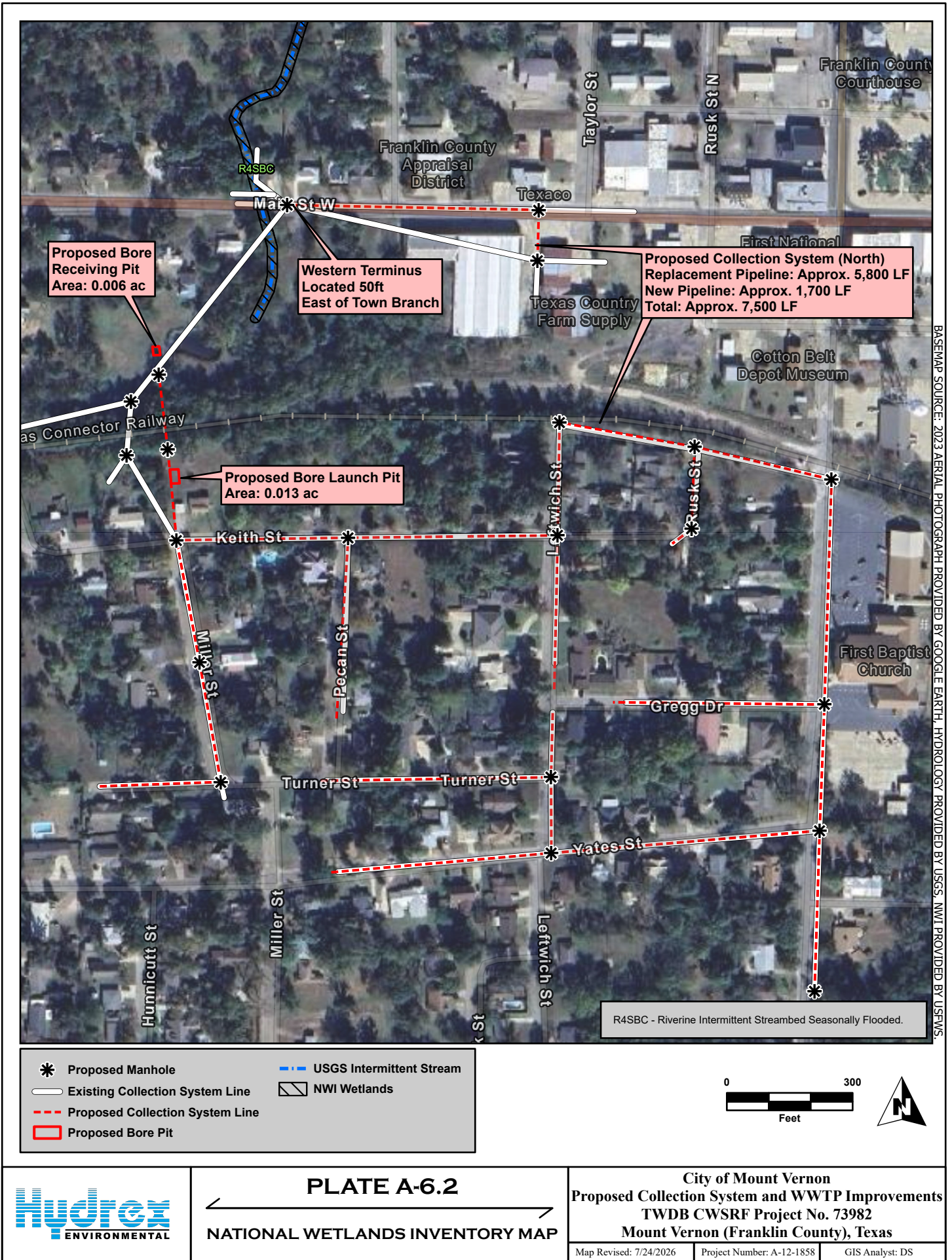


PLATE A-5

FEMA FLOOD INSURANCE RATE MAP

City of Mount Vernon Proposed Collection System and WWTP Improvements TWDB CWSRF Project No. 73982 Mount Vernon (Franklin County), Texas		
Map Revised: 7/24/2026	Project Number: A-12-1858	GIS Analyst: DS





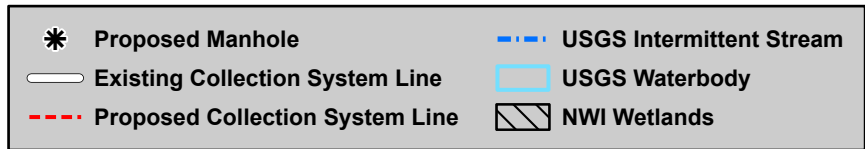
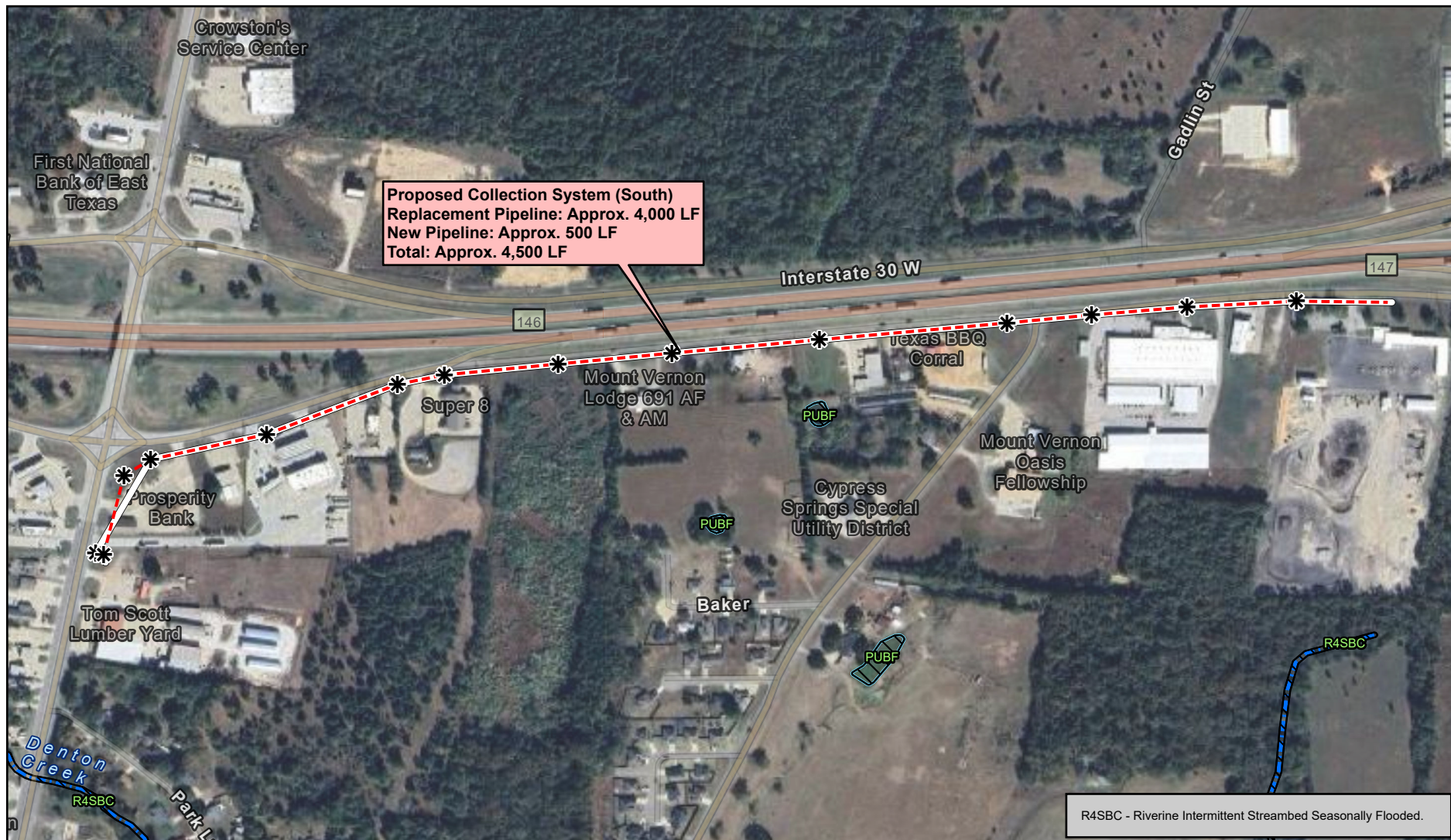
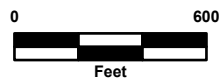


PLATE A-6.3

NATIONAL WETLANDS INVENTORY MAP



City of Mount Vernon
Proposed Collection System and WWTP Improvements
TWDB CWSRF Project No. 73982
Mount Vernon (Franklin County), Texas

Map Revised: 7/24/2026	Project Number: A-12-1858	GIS Analyst: DS
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