



P.O. Box 13231, 1700 N. Congress Ave.
Austin, TX 78711-3231, www.twdb.texas.gov
Phone (512) 463-7847, Fax (512) 475-2053

CATEGORICAL EXCLUSION

TO ALL INTERESTED AGENCIES AND PUBLIC GROUPS:

As provided by the environmental review process adopted in the rules of the Texas Water Development Board (TWDB), 31 Texas Administrative Code (TAC) § 371.41, for projects to be funded through the Drinking Water State Revolving Fund (DWSRF) Lead Service Line Replacement (LSLR) program and consistent with the National Environmental Policy Act, 42 United States Code § 4321, *et seq.*, the TWDB has determined that the proposed action identified below may be exempted from comprehensive environmental review:

City of Marshall, Harrison County, Texas
TWDB DWSRF LSLR Project No. 63062
Water Service Line Inventory and Replacement
Total Financing Amount: \$2,989,796
Loan No. L1002064
Loan Forgiveness No. L1002065

The City of Marshall (City) is proposing to use \$2,989,796 in financing from the DWSRF-LSLR program for the Water Service Line Inventory and Replacement project to replace 1,013 lead and galvanized requiring replacement (GRR) service lines throughout its service area that are remnants of previous partial replacement efforts. The funding would be used to replace galvanized pipes when the upstream service line material is known to be or historically may have been lead. The proposed project would assist the City to become a lead-free system.

Existing lines will be replaced by new lines in the same or proximate locations (within 3 feet). The existing lines will be capped and abandoned in place. Environmental impacts will be similar to rehabilitation activities and limited to those associated with excavation and pipe installation. In some cases, trenchless boring may be used, particularly under sidewalks and driveways. Replacement will occur on private residential and commercial property and right-of-entry permissions will be required prior to replacement. Trenches will be approximately 3 feet wide, 2 feet deep, and each service line is expected to average approximately 50 linear feet (LF).

Given that most lines will occur on developed, urban property, the proposed project is not anticipated to adversely impact communities, historical or cultural resources, waterbodies, potential habitat, prime farmland, or protected species. The proposed project will not intersect waterbodies and therefore will not adversely impact waters of the United States,

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including wetlands. In addition, the proposed project is not expected to impact threatened or endangered species or habitat, as service line replacement will not require tree or other vegetation removal. Some service line replacements will occur within a 100-year floodplain, as designated by the Federal Emergency Management Agency (FEMA). Projects involving construction in the 100-year floodplain, including replacement or borings, require a floodplain development permit from the local floodplain administrator prior to construction in the 100-year floodplain.

To ensure that there will be no adverse environmental impacts associated with the construction in historic districts or near potential archeological sites, cemeteries, etc., the City coordinated with the Texas Historical Commission (THC). In a letter dated July 7, 2026, the THC stated that the proposed service lines would not adversely affect sites listed on the National Registry of Historic Places (NRHP) or other above ground resources. The THC recommended that three addresses be considered as contributing resources to the Ginocchio Historic District, which was listed in the NRHP in 1974.

The staff of the TWDB previously recommended issuance of a Categorical Exclusion (CE) for this project. The decision to grant this CE is allowed because the specified project elements will not cause significant adverse impacts to cultural and natural resources. Documentation supporting this determination is on file at the TWDB.

This determination shall be revoked if it is found that

- (1) the project no longer meets the requirements for categorical exclusion from full environmental review as a result of changes in the project;
- (2) the project involves extraordinary circumstances as described in 31 TAC § 371.42;
or
- (3) the project may violate or has violated federal, state, local, or tribal laws.

The proposed project must comply 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, the City of Marshall (City) will comply with the terms and conditions of floodplain development permits issued for the project by Harrison County on August 3, 2026.
- To ensure there would be no impacts to terrestrial or aquatic habitat for state or federally listed threatened and endangered or other protected species, or waters of the United States, proposed construction will not require vegetation removal and will

not intersect waterbodies. If construction is anticipated to affect vegetation or waterbodies, the Texas Water Development Board (TWDB), Texas Parks and Wildlife Department, United States Fish and Wildlife Service, and United States Army Corps of Engineers will be notified prior to construction at those sites.

Standard Environmental Conditions

- Consistent with the TWDB Supplemental Construction Contract Conditions (TWDB-0550), the City will abide by the standard emergency condition for the discovery of cultural resources.
- Consistent with the TWDB Supplemental Construction Contract Conditions (TWDB-0550), the City will abide by the standard emergency condition for the discovery of threatened and endangered species.

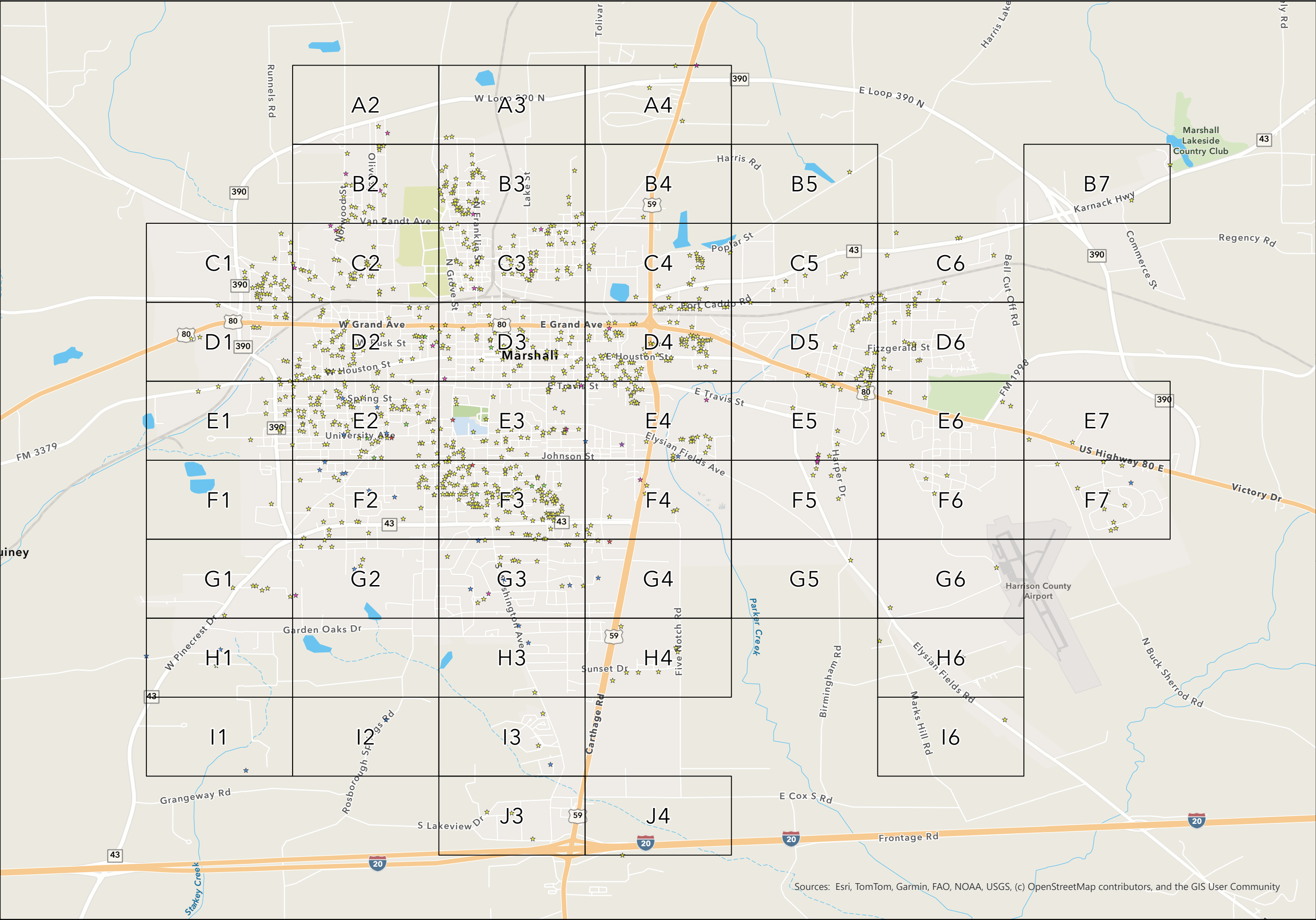
Comments regarding this determination may be submitted to the Director of Regional Water Project Development, Texas Water Development Board, P.O. Box 13231, Austin, Texas 78711-3231 or via email at RWPD-Environmental@twdb.texas.gov.

Sincerely,

Clay Schultz Digitally signed by Clay Schultz
Date: 2026.10.01 09:02:58
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T. Clay Schultz, Ph.D., Director
Regional Water Project Development

Enclosures

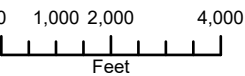


Grid



City of Marshall
LSLR
Existing Meters
Map

1" = 3,500'



Cover
Map