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April 3, 2025

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, an environmental review consistent with the National Environmental Policy Act (NEPA), 42 United States Code § 4321 et seg., has been performed on the project below. This project is proposed to be funded through the Clean Water State Revolving Fund (CWSRF) Equivalency Program, which is administered by the TWDB.

City of Corrigan, Polk County, Texas TWDB CWSRF Project No. 73919 Wastewater Treatment Plant Rehabilitation and Expansion Total Financing Amount: \$6,775,000 Loan Nos. L1001509, LF1001510

The City of Corrigan (City) is proposing to use \$6,775,000 in financial assistance from the CWSRF Program for the Wastewater Treatment Plant (WWTP) Rehabilitation and Expansion Project to expand the current treatment capacity from 0.3 to 0.6 MGD. This project is needed to resolve enforcement actions related to the treatment capacity and operations, and to address expected future growth in population within the City's service area.

An environmental review of the project consistent with NEPA has been completed following the guidelines provided in 31 TAC § 375.61. 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:

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.

Our Mission **Board Members** L'Oreal Stepney, P.E., Chairwoman | Tonya R. Miller, Board Member Bryan McMath, Executive Administrator

Leading the state's efforts in ensuring a secure water future for Texas

 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.

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 <u>RWPD-Environmental@twdb.texas.gov</u>. 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 Finding of No Significant Impact.

Sincerely,

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

Enclosure



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

City of Corrigan, Polk County, Texas Clean Water State Revolving Fund Project No. 73919 Wastewater Treatment Plant Rehabilitation and Expansion Environmental Assessment

REVIEW PROCESS

As described below, Texas Water Development Board (TWDB) staff 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 Wastewater Treatment Plant (WWTP) Rehabilitation and Expansion project proposed by the City of Corrigan (City) was reviewed by TWDB staff for the development of this Environmental Assessment (EA). This project is financed through the Clean Water State Revolving Fund (CWSRF) Equivalency Program, which is administered by the TWDB.

The City of Corrigan owns and operates existing water and sewer utilities for a population of approximately 1,967 throughout the service area of north central Polk County, Texas. The City's WWTP service area encompasses approximately 656 connections near and within the city limits.

PURPOSE AND NEED

The City is currently under enforcement by the Texas Commission on Environmental Quality (TCEQ) for exceeding permitted wastewater discharge effluent parameters, including daily average flow, ammonia nitrogen, total suspended solids, and 5-day carbonaceous biochemical oxygen demand (TCEQ Case No. 57568, Docket 2019-0557-MWD-E). The existing WWTP components are aging, deteriorated, and in need of expansion and rehabilitation to achieve compliance and to accommodate expected future population growth within the City's service area.

The City intends to acquire new property adjacent to the existing WWTP for the construction of a WWTP expansion that will effectively double the current treatment capacity from 0.3 to 0.6 million gallons per day (MGD). Once the expansion is complete the City plans to remove the existing WWTP components from service for rehabilitation including the existing clarifier,

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¹ City of Corrigan (May 2024). Environmental Information Document (EID) (Form TWDB-0801), Prepared by Hydrex Environmental. Received by TWDB on May 9, 2024. The EID is complete with the supplementary materials submitted to the TWDB on September 20, 2024.

oxidation ditch, and digester. In addition, the City will create and implement an asset management plan.

PROJECT DESCRIPTION

The project components included in this EA are:

- Acquiring new property adjacent to the existing WWTP;
- Headworks modifications;
- A new mechanical bar screen and chamber;
- Aeration expansion and improvements;
- Clarifier expansion and improvements;
- Flow equalization basin rehabilitation;
- Chlorine contact basin expansion;
- Chlorine equipment rehabilitation;
- Sludge digestor improvements;
- Construction of a new 0.6 MGD conventional aeration basin with blowers and diffusers; and
- Other miscellaneous items of construction, including: rehabilitate and extend entrance road, sludge drying improvements, and office.

PROJECT FUNDING

To address these issues, the City applied to the TWDB for financing through the CWSRF Program for planning, design, construction, and acquisition of land and easements. On July 7, 2022, the TWDB committed \$6,775,000 for the project. The City closed the financing on October 20, 2022. 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 action alternative, the City evaluated the no-action alternative and constructing alternative equipment and treatment units. 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 on land use than the preferred alternative but would have greater adverse impacts to surface water quality. If no action is taken, the WWTP will continue to exceed TCEQ parameters, and the facility will not be able to support the future population growth. This would adversely impact the quality of life for the residents of Corrigan and those downstream of the City's WWTP outfall.

Alternative Not Selected

The alternative not selected was to construct alternative equipment and treatment units. This alternative would use an ultraviolet disinfection and would construct a new 0.3 MGD oxidation ditch and rehabilitation of the existing oxidation ditch. This alternative was not chosen because of extensive financial requirements, ineffective treatment units, construction constraints, and TCEQ Buffer Zone constraints. This alternative would have involved increased land acquisition and undeveloped land use changes. Financially, structurally, and environmentally, this option includes higher adverse impacts than benefits and therefore was rejected.

Preferred Alternative

The preferred alternative is described above under the Project Description. The purpose of the preferred alternative is to provide adequate and effective treatment of the City's wastewater, which the no-action alternative would not provide at present or in the future.

The cumulative effects of the preferred alternative would be to improve the quality of life for the existing and futures residents of the City, as well as those who are affected by the surface water quality downstream of the WWTP outfall.

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 to prepare the present EA.

ENVIRONMENTAL SETTING

Existing Conditions

The project is located in the City of Corrigan, in the northern portion of Polk County, Texas, approximately 90 miles north-northeast of Houston. The existing WWTP is located approximately 0.25 miles east of the intersection of East Ben Franklin Street and U.S. Highway 59, which is just outside of the city limits.

The existing WWTP property has been developed as a treatment site since the 1950s or 1960s. The expansion will convert an undeveloped, 1.38-acre property to the north of the existing site to a treatment site as well. This adjacent property has been historically used for pastureland, hay production, forested land, and an open-water pond.

Geology and Soils

The project is located within the Gulf Coast Plains Physiographic Province of Texas, which is situated parallel to the Atlantic coastline and is generally flat to gently sloping to the southeast and sectioned by the state's major rivers. major rivers. numerous streams. The Geologic Atlas of Texas, Palestine and Beaumont Sheets, indicates surface soils are derived from the Alluvium (QAI), Catahoula Formation (Mc), and Whitsett Creek Formation (OEw). Alluvium is characterized by unconsolidated material deposited by a river, stream, or other body of running water. The Catahoula Formation is characteristically composed of series of continental sands and clay. This Miocene aged formation was deposited as a part of the Chita-Corrigan fluvial system of the Houton Embayment. Sands associated with the Chita-Corrigan fluvial system are quartzose reworked from sedimentary terranes. Eocene-Oligocene aged Whitsett Creek Formation is the upper part of the Jackson Group and is generally defined as a light to dark gray, fine-to medium-grained, massive to cross bedded sandstone.

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 project footprint is located on the soil units CIB (Colita-Laska complex, 1 to 3 percent slopes) and HatA (Hatliff-Pluck-Kian complex, 0 to 1 percent slopes) of the Natural Resource Conservation Service (NRCS) Soil Survey. The CIB unit is classified as Prime Farmland; therefore, the City coordinated with the U.S. Department of Agriculture (USDA). Soil will not be moved off site and will not be contaminated as a result of the project.

Water Resources

The City currently has a permit with the TCEQ to discharge waste from the WWTP into Dry Creek, which flows into Bear Creek, then Piney Creek before reaching the Neches River Below Lake Palestine in Segment 0604 of the Neches River Basin. The Texas Pollutant

Discharge Elimination System (TPDES) Permit No. WQ0015057001 was issued on March 18, 2022, and will expire five years from the date of issuance on March 18, 2027. A permit application for a major amendment for an increase in effluent flow will be submitted to the TCEQ upon completion of project design documents. The project will not result in a new or relocated effluent discharge site.

The source of the City's water supply is groundwater from the Yegua-Jackson aquifer. 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.

Topography and Floodplains

Elevation across the project area ranges from approximately 187 to 242 feet above mean sea level. The topography of the project area is moderately sloping towards Dry Creek to the southeast. The drainage then continues northeast via tributaries to the Neches River. The WWTP property is partially located within the 100-year floodplains of Dry Creek. The City and Polk County participate in the National Flood Insurance Program (NFIP). No permanent impact to the floodplain or floodway will occur because of the project, as construction is expected to occur outside of the mapped floodplain.

Wetlands, Streams, and Waters of the United States

The project area is located within the watershed of the Neches River. The project is located just adjacent to Dry Creek. There are no streams in the project site. The project will not adversely impact waters of the United States, including wetlands.

The project does not involve significant impacts to water quality. Temporary impacts associated with project construction are possible. As part of project construction, a stormwater pollution prevention plan (SWPPP) will be developed alongside a TCEQ construction stormwater permit to identify best management practices for the prevention of erosion into local waterways.

Biological Elements

The project area is located within the Western Gulf Coastal Plain Ecological Region. A preliminary habitat evaluation for all federal- and state-listed species for Polk County, Texas, was conducted. Federal-listed species were provided by the *Official Species List* generated through the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) online system, while state-listed and rare species were provided by Texas Parks and Wildlife Department (TPWD). The TPWD Texas Natural Diversity Database (TXNDD) for the area was also reviewed for known pre-existing rare, threatened, and endangered plants, animals, natural communities, and animal aggregations near the project site.

A site reconnaissance was performed on April 4, 2022, to visually inspect the project site for listed individuals and their associated habitat. The project area primarily consists of mowed and maintained pastureland or existing wastewater treatment infrastructure. No wildlife species of note were observed during the survey.

All twenty-five (25) federal- and state-listed species were given a "no effect" determination due to one or more of the following reasons: 1) the habitat evaluation revealed no suitable habitat for any of the species, or 2) the project will not result in the destruction or adverse modification of critical habitat of threatened or endangered species listed. Although a "no effect" determination was given for these twenty-five (25) species, if any federal or state-listed species are encountered during construction activities, the species must be allowed to safely leave the site or TPWD should be contacted to translocate the species to suitable habitat.

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

The Texas Historical Commission's (THC) Archeological Sites Atlas was reviewed to identify historic properties, archeological sites, and cultural resources near the project area. There are no previously recorded significant or potentially significant sites within or adjacent to the project footprint, nor is the project within the protected area surrounding a historic cemetery, structure, or district.

The project was reviewed by the THC staff in accordance with Section 106 of the National Historic Preservation Act as well as the Antiquities Code of Texas. Their review indicated that no above-ground historic properties are present and that no archaeological resources were expected to be affected by the project, and that no further cultural resource investigations were required. The recommendation included the condition that if buried cultural materials are uncovered during construction, work should immediately stop in that area and the Archeology Division of the Texas Historical Commission should be notified.

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.

Social Implications and Environmental Justice

The proposed project was evaluated for environmental justice (EJ) impacts using the Environmental Justice Screening and Mapping Tool (EJScreen), a mapping tool designed by the EPA that allows users to create maps and generate reports on factors that may affect public and environmental health. Data include population, percentage of minority residents, percent low income, and per capita income, for comparison with data for the county and state.

An EJ analysis was performed on for the project area and within a 0.5-mile radius. The results are listed below with data from the United States Census for the state and county included for comparison.

Area	Population	Percent Minority	Percent Below Poverty Level	Per Capita Income
State of Texas	30,976,754	57%	14%	\$37,514
Polk County	49,372	29%	18.7%	\$27,922
City of Corrigan	2,055	8%	21.8%	\$21,805
Project Area (0.5-mile buffer)	618	34%	Unknown	\$22,528

The EJ analysis indicates that the area within 0.5 mile of the project has a portion of the population greater than the city, county or state average, who are members of a racial/ethnic minority category or who have incomes less than or equal to the state's official poverty level. Because there are no anticipated permanent adverse environmental impacts to the local community, the project is not expected to disproportionally impact low-income or minority populations. These populations will be subject to temporary adverse impacts, such as possible construction noise and traffic disruptions, but should equally benefit from the improvements in treatment services.

An increase in utility rates and taxes is not anticipated, and will not require an increase in taxes to finance the debt. 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 impact minority or low-income populations.

Secondary and Cumulative Impacts

The project may temporarily impact air quality and vegetation. Both resources will return to the state existing prior to the project once construction activities are completed. Past projects including construction of 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 agricultural and residential uses following the construction of the project. The adjacent pastureland acquired for expansion of the WWTP will be permanently converted to mowed and maintained property housing treatment infrastructure.

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

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.

"Cross-Cutter" Compliance

The project has been reviewed for potential impacts to the quality of the environment following the procedures provided in 31 Texas Administrative Code § 375.61, to ensure compliance with CWSRF 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
- (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.
- (16) Environmental Justice, Executive Order 12898
- (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 listed below:

- 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 (THC Tracking No. 202404611)
- United States Army Corps of Engineers, Regulatory Branch, Galveston District, in accordance with Section 404 of the Clean Water Act; and Section 10 of the Rivers and Harbors Act of 1899 (Project No. SWG-2024-00124)
- 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. 51975).
- United States Fish and Wildlife Service, Texas Coastal and Central Plains Ecological Services Field Office, in accordance with the Endangered Species Act and statutes affecting other federally protected species (USFWS Project Code 2024-0041413)
- 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 2022-008)
- TWDB, National Flood Insurance Program (NFIP) State Coordinator, 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 Land Management
- Local Floodplain Administrator pursuant to the NFIP
- Local government (City Mayor)

Texas Historical Commission

The THC staff concurred with the City in correspondence dated January 16, 2024, that no direct impacts to cultural resources/historic properties are anticipated as a result of the project (THC Tracking No. 202404611).

United States Army Corps of Engineers

The USACE, Galveston District Office, Regulatory Branch staff was given the opportunity to review the project (USACE Project Number SWG-2024-00124) and issued an approved jurisdictional determination (ADJ)³ dated May 6, 2024. A jurisdictional determination identifies what waterbodies in the project area qualify as waters of the United States (WOTUS) according to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act. The USACE determined that no waters of the United States, including wetlands, occur on the project site.

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 March 25, 2024, (TPWD Project No. 51975) The TPWD staff indicated that it does not anticipate significant adverse impacts to rare, threatened, or endangered species, or other fish and wildlife resources.

United States Fish and Wildlife Service

The USFWS Texas Coastal & Central Plains 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. 2024-0041413). The USFWS consistency letter dated January 26, 2024, 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 January 27, 2022, 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 Polk County is currently unclassified or in attainment of the National Ambient Air Quality Standards for all six criteria air pollutants (TCEQ NEPA Request No 2022-008). 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 no long-term impacts are 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 July 19, 2023, the USDA-NRCS provided a determination that the project area is exempt from the FPPA provision. Although the project area does contain Prime Farmland, the USDA-NRCS considers the location to be "land

committed to urban development" due to its adjoining location to the city limits of Corrigan, Texas.

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 May 8, 2024, which was advertised in the *East Texas News*, a newspaper of general circulation in the service area. The notice was published on April 7, 2024, and contained information regarding availability of planning documents, including the EID, for public review at Corrigan City Hall at 101 W. Ben Franklin St., Corrigan, Texas, during normal business hours (8 a.m. to 5 p.m.).

The public meeting was held at 10 a.m. on May 8, 2024, at 101 W. Ben Franklin St., Corrigan, Texas, 75939. A total of six people attended the meeting, none of whom was a member of the public and not part of the project team. No other 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. 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 Rehabilitation and Expansion project is considered environmental conditions:

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.

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



