P.O. Box 13231, 1700 N. Congress Ave.
Austin, TX 78711-3231, www.twdb.texas.gov
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, 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. This project is proposed to be funded through the Clean Water State Revolving Fund (CWSRF) Program, which is administered by the TWDB.

City of Aledo, Parker County, Texas
TWDB CWSRF Project No. 73946
Wastewater Treatment Plant Expansion Project
Total Financing Amount: $27,775,000
Loan No. L1001770

The City of Aledo (City) is proposing to use $27,775,000 in financing from the CWSRF Program for the Wastewater Treatment Plant (WWTP) Expansion Project to expand the WWTP to increase the permitted capacity from 0.6 million gallons per day (MGD) to 1.2 MGD.

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:

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, across, or under a Special Flood Hazard Area, and any requirements contained therein will be adhered to.
- To ensure compliance with the Endangered Species Act (ESA) of 1973, as amended, per an agreement with the United States Fish and Wildlife Service

(USFWS), to avoid potential impacts to the whooping crane (*Grus americana*), the following mitigation measures will be implemented:
    - Construction site staff will be provided with educational materials on the appearance and status of the whooping crane in order to identify individuals. Staff will monitor nearby potential habitat and if an individual is detected within 1,000 feet of a work site, work will cease until the crane has moved outside of the 1,000-foot buffer zone.
    - If a whooping crane is observed for any length of time in the project area, the USFWS Arlington Ecological Services Field Office will be notified as soon as possible.
- If the alligator snapping turtle (*Macrochelys temminckii*) or Monarch butterfly (*Danaus plexippus*) become federally listed prior to vegetation clearing and/or construction, the City of Aledo (City) will conduct additional coordination with the USFWS to ensure compliance with the ESA.

Standard Environmental Conditions

- Consistent with the TWDB Supplemental Construction Contract Conditions (TWDB-0551), the City will abide by the standard emergency condition for the discovery of cultural resources.
- Consistent with the TWDB Supplemental Construction Contract Conditions (TWDB-0551), 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 Finding of No Significant Impact.

Sincerely,

Clay Schultz Digitally signed by Clay Schultz
Date: 2025.08.25 14:37:40 -05'00'

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 Aledo, Parker County
Clean Water State Revolving Fund Project No. 73946
Wastewater Treatment Plant Expansion Project
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 Expansion Project proposed by the City of Aledo (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) Program, which is administered by the TWDB.

PURPOSE AND NEED

The wastewater treatment demands in the City have increased in recent years, and demand increases are projected to continue with the planned growth in the community. Per Texas Commission on Environmental Quality (TCEQ), Chapter 305 Consolidated Permits, whenever flow reaches 75 percent of the permitted average flow for three consecutive months, engineering and financial planning for the expansion of the wastewater facility must be initiated. The purpose of the project is to increase the capacity of the wastewater treatment plant (WWTP), from 0.6 million gallons per day (MGD) to 1.2 MGD, to meet projected demands of the service area.

PROJECT DESCRIPTION

The proposed project includes the expansion of the WWTP to increase the permitted capacity from 0.6 MGD to 1.2 MGD. The proposed improvements include site grading, plant roads, yard piping, screening, influent lift station, chemical feed system, filters, UV disinfection, sludge holding tank, blowers, sludge transfer pump station, solids dewatering, construction of three sequencing batch reactor (SBR) basins and an electrical building, and the expansion of the maintenance building. Demolition of the existing lab building, sludge

[1] City of Aledo (June 6, 2025). Environmental Information Document (EID) (TWDB Form 0801), Prepared by Freese and Nichols, Inc. Received by TWDB on May 19, 2025, The EID is complete with the supplementary materials submitted to the TWDB on June 6, 2025.

holding tank, belt filter press, UV treatment equipment, and two control panels would occur. The proposed project would be completely within the existing WWTP boundaries and existing access road.

The project components included in this EA include:

- Demolition of selected existing site components
- Expansion of the existing maintenance building
- Construction of:
    - an electrical building
    - three SBR basins
    - two sludge holding tanks
    - a post-equalization basin
    - a dewatering unit
- Installation of a new generator
- Installation of a master control system for the SBR system
- Grading the existing hill for new basins
- Installation of electrical and utility connections
- General site paving, grading, yard piping, and other appurtenances

PROJECT FUNDING

To address these issues, the City applied to the TWDB for financing through the CWSRF Program for planning, design, and construction. On April 11, 2024, the TWDB committed $27,775,000 for the project. The City closed the financing on April 3, 2025. 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 two additional alternatives. Each alternative was evaluated for its potential direct, secondary, and cumulative impacts on the existing environment.

No-Action Alternative

The No-Action Alternative would involve maintaining the existing WWTP structures and capacity. With the No-Action Alternative, the existing WWTP may exceed its permitted capacity and would subsequently become out of compliance with its permit to discharge. There are numerous public health risks associated with wastewater treatment facilities that

are not able to handle their influent, such as sanitary sewer overflow and contaminants being discharged into public waterbodies and watersheds. Therefore, the No-Action Alternative may have greater impacts to surface water quality and aquatic habitat than other alternatives. At the same time, increases in treated effluent discharge into local streams from WWTPs can also have adverse effects on aquatic habitat. The No-Action Alternative would not place additional structures in the floodplain and would therefore have less impact on the floodplain than alternatives.

The No-Action Alternative has been rejected because it is necessary to expand the WWTPs capacity to meet future demands. The project is necessary to protect the receiving stream from pollutants and to protect the collection system from sanitary sewer overflows.

Alternative Not Selected

A proposed alternative is to construct a separate WWTP to treat anticipated future demands of the service area. Under the Alternative Not Selected, a new WWTP would be constructed at a new, undeveloped site. Compared to expanding the existing WWTPs treatment capacity, the Alternative Not Selected would result in greater potential impacts to existing land uses, farmland, and habitat than the Preferred Alternative. The increase in effluent discharge to waterways would be the same as the Preferred Alternative. The socioeconomic and health benefits of improved wastewater treatment systems to the community is the same for both the Alternative Not Selected and the Preferred Alternative.

The Alternative Not Selected was rejected because it would have greater impacts to land due to the acquisition of a new WWTP site and new easements, it would have greater impacts on undeveloped areas, and the costs of acquiring easements would be greater than using the existing WWTP.

Preferred Alternative

The Preferred Alternative is described above under the Project Description. The purpose of the preferred alternative is to provide reliable and sustainable wastewater treatment for the City, which the No-Action Alternative would not provide.

The proposed project was chosen primarily because it maximizes the use of the existing WWTP. It was also chosen because upgrading the existing WWTP would not require construction of a new WWTP at a new site. Expanding the capacity of the existing WWTP is an efficient and practicable alternative. Expansion of the WWTP’s capacity would keep the WWTP in compliance with its permit and would subsequently protect the receiving stream and service area from pollutants.

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

Existing Conditions

The proposed project would be constructed in the city of Aledo and would serve the population of Aledo. The project is located in the southeastern portion of Parker County, adjacent to the Clear Fork Trinity River, approximately one mile southwest of downtown Aledo.

The existing WWTP was first permitted for wastewater discharge on February 2, 1990. Ascertained through aerial imagery, the site appears to have been comprised of riparian forest prior to the construction of the WWTP. The project area is adjacent to residential neighborhoods which were converted from farmland in the early 21st century. There are no anticipated adverse or beneficial impacts on land use from the project. The project will occur within the existing WWTP site boundaries. The designated land uses near the proposed project would not be permanently impacted.

Geology and Soils

The project is located within the Grand Prairie Physiographic Province of Texas. The proposed project area is typical of the region and includes gently rolling plains and fluvial terraces along streams.[2] Geologically, the project is underlain by the Walnut Clay (Kwa) geologic formation. Clay and limestone are about equally abundant. The formation is comprised of clay, limestone, and shale. Clay is calcareous. Limestone is chalky, marly, nodular, thick bedded, with a few hard beds with sparry calcite. Shale is thin beds with a thickness of 125 to 175 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 project area does not contain prime or important farmlands, as designated by the United States Department of Agriculture Natural Resource Conservation Service (USDA-NRCS).

[2] Bureau of Economic Geology (1996). “Physiography of Texas.” The University of Texas at Austin.

Water Resources

The project is located in the Trinity River Basin. The City's water supply derives from both surface and groundwater supply. The City of Fort Worth supplies Aledo's surface water from Lake Worth, Eagle Mountain Lake, Lake Bridgeport, Richland Chambers Reservoir, Cedar Creek Reservoir, Lake Benbrook, and the Clear Fork Trinity River. The City's groundwater supply derives from the Trinity and Paluxy aquifers. The Trinity major aquifer is located underneath the project site. There are no Environmental Protection Agency (EPA) designated sole source aquifers in the project area.

The project should not involve significant impacts to water quality. Temporary impacts associated with project construction are possible. The proposed project would discharge into stream segment ID 0831, Clear Fork Trinity River Below Lake Weatherford, which is impaired for contact recreation due to bacteria and depressed dissolved oxygen in the water. According to the most recent approved Texas Integrated Report (2022), additional data and information will be collected or evaluated before a management strategy is selected. A Total Maximum Daily Load (TMDL) has not been established.

Treated wastewater effluent can contain residual pollutants, like pharmaceuticals, nutrients, and PFAS, for example. Wastewater effluent can increase nutrient enrichments in water bodies, which can lead to algal blooms and create low oxygen conditions. Thermal temperature increases are common discharge waters can be warmer than natural water body temperatures and velocity changes in stream flow can alter the shape and stability of the receiving water downstream. These effects can push organisms out of their tolerance zones and stress aquatic life. However, the proposed increase in treatment capacity at the Aledo WWTP is expected to decrease the potential for pollutant loading to the receiving stream from sanitary sewer overflows due to inadequate infrastructure. Upon completion of the proposed project, the reliability of the WWTP would be improved, thereby reducing the chance of major disruptions that could affect the residents. 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.

The proposed project required an amendment to an existing TCEQ discharge permit. A new Texas Pollutant Discharge Elimination System (TPDES) permit for the City's WWTP was issued on June 17, 2025 (TPDES Permit No. WQ0010847001). Effluent limits will increase once the project is constructed, and monitoring will increase from oncer per week to twice per week. The carbonaceous biochemical oxygen demand (BOD) 5-day daily average discharge limit will increase from 79 pounds (lbs)/day to 100 lbs/day; total suspended solids (TSS) daily average from 119 lbs/day to 150 lbs/day; ammonia nitrogen daily average from 24 lbs/day to 30 lbs/day; and total phosphorus daily average from 7.9 lbs/day to 10 lbs/day.

From the permit, "The treated effluent is discharged to an unnamed tributary, thence to Clear Fork Trinity River (Segment No. 0831). The unclassified receiving water use is minimal aquatic life use. Designated uses for segment no. 0831 are primary contact recreation, public water supply, and high aquatic life use. The effluent limitations in the draft

permit will maintain and protect the existing instream uses. An antidegradation review of the receiving waters was performed. A Tier 1 antidegradation review has preliminarily determined that existing water quality uses will not be impaired by the permit action. The review determined that no water bodies with exceptional, high, or intermediate aquatic life uses are present within the stream reach…No significant degradation of water quality is expected in water bodies with exceptional, high, or intermediate aquatic life uses downstream, and existing uses will be maintained and protected….The discharge from the permit action is not expected to have an effect on any federal endangered or threatened aquatic or aquatic-dependent species or proposed species or their critical habitat."

Temporary surface water runoff impacts are expected during construction. 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 790 to 825 feet above mean sea level. The topography of the project area generally drains west, with a consistent downward slope from east to west toward the Clear Fork Trinity River. The proposed project is located within the riparian zone of a tributary to the Clear Fork Trinity River that merges into the riparian floodplain of the Clear Fork Trinity River. The tributary is impounded north of the project site.

The project is partially located within the 100-year floodplain of the Clear Fork Trinity River, as designated by the Federal Emergency Management Agency (FEMA). The City and Parker County participate in the National Flood Insurance Program (NFIP).

The proposed project is not expected to have permanent adverse impacts to flood elevations. Surface modifications as part of the proposed project within the 100-year floodplain would be minor in relation to the entire floodplain and are not expected to result in significant impacts to flood valley storage. Preliminary coordination with the Floodplain Administrator has begun, and during the detailed design phase, a floodplain development permit application will be submitted to the Floodplain Administrator to ensure the project is reviewed and authorized, as required.

Wetlands, Streams, and Waters of the United States

The project area is located within the United States Geological Survey (USGS) hydrologic unit code (HUC)-12 subwatershed of the Brown Branch-Clear Fork Trinity River. The project is located just adjacent to an unnamed tributary to the Clear Fork Trinity River that meets the Clear Fork Trinity River approximately 600 feet downstream of the project site. There are no waterbodies at the project site. The project will not adversely impact waters of the United States, including wetlands.

An Approved Jurisdictional Determination and No Permit Required Letter dated November 13, 2024, concurred with findings from a site survey conducted by Freese and Nichols, Inc. that no wetlands or waterbodies are present at the project site (United States Army Corps of Engineers (USACE) Project Number SWF-2009-00411).

Biological Elements

The project area is located within the Environmental Protection Agency (EPA) Level III Cross Timbers Ecological Region. The Western Cross Timbers has a variety of soil types, terrain features, and vegetative plant communities. The terrain in the subregion and project area is very hilly, with sandstone and limestone escarpments, steep slopes, and irregular surface features. Post oak/blackjack oak woodlands characterized much of the Western Cross Timbers. Present day land use in the Western Cross Timbers includes grazing, some cropland, hunting, coal, oil/natural gas production, and urban/ residential areas in the eastern portion of the ecoregion. The Aledo WWTP abuts a residential neighborhood to the southeast, private property to the east, and cattle grazing lands to the north. Oil and gas exploration/production infrastructure neighbors the WWTP to the southwest. The proposed project area is located within an existing, developed, mowed and maintained WWTP site and its access road, just east of Clear Fork Trinity River, in the northwest corner of a residential neighborhood.

A biological assessment[3] was conducted on March 6, 2024. In nearby vegetated areas, dominant vegetation was a mix of periodically mowed herbaceous species and trees adjacent to the mowed areas. Observed species included: cedar elm (*Ulmus crassifolia*), pecan tree (*Carya illinoinensis*), sugarberry (*Celtis laevigata*), Texas live oak (*Quercus fusiformis*), dandelion (*Taraxacum officinale*), burclover (*Medicago polymorpha*), cheatgrass (*Bromus tectorum*), cedar sedge (*Carex planostachys*), crowpoison (*Nothoscordum bivalve*), field brome (*Bromus arvensis*), hedgeparsley (*Torilis arvensis*), henbit deadnettle (*Lamiun amplexicaule*), redstem stork's bill (*Erodium cicutarium*), rescuegrass (*Bromus catharticus*), shepherd's purse (*Capsella bursa-pastoris*), and Texas bluegrass (*Poa arachnifera*).

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 Parker County.

According to the USFWS Information for Planning and Consultation (IPaC) resource list, received (updated) on January 22, 2025, the following four species are listed as threatened, or endangered, or proposed threatened or endangered, under the Endangered Species Act (ESA) and may occur in the project area in Parker County, Texas: piping plover (*Charadrius melodus*; threatened), red knot (*Calidris canutus rufa*; threatened), whooping crane (*Grus americana*; endangered), alligator snapping turtle (*Macrochelys temminckii*;

[3] Freese and Nichols, Inc. (January 23, 2025). Environmental Pedestrian Survey Memorandum, Aledo WWTP Expansion Project, prepared by C. Sullivan and S. Sultemeier

proposed threatened), and monarch butterfly (*Danaus plexippus*; proposed threatened). Piping plover and red knot are designated for this area as only needing impact consideration for wind energy projects. The proposed project is not a wind energy project, and therefore, additional consideration for these two species is not required.

Potential migratory stopover habitat for the whooping crane, ponds north of the project area, are located within 1,000 feet of the project area. This distance is considered to be within a buffer zone where project construction may cause disturbance to the crane if occurring during the migration seasons. The USFWS recommended that if a whooping crane is detected within 1,000 feet of construction, that work would cease until the crane has moved outside of the buffer zone.

The alligator snapping turtle and monarch butterfly may be found in or near the project area. If these species are listed prior to or during construction, activities will cease, and the USFWS will be consulted to assess for potential impacts. Construction will occur on a developed, mowed and maintained property; however, ambulatory and winged individuals may intersect construction activities.

No occurrences of federally listed 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. The proposed project is
not expected to jeopardize the continued existence of any proposed, threatened, or endangered species.

While the proposed project is not anticipated to affect state or federally listed threatened or endangered species, multiple Species of Greatest Conservation Need (SGCN) may find habitat in forested riparian area adjacent to the project site, including the long-tailed weasel (*Mustela frenata*), eastern spotted skunk (*Spilogale putorius*), western box turtle (*Terrapene ornata*), eastern box turtle (*Terrapene carolina*), Strecker's chorus frog (*Pseudacris streckeri*), Woodhouse's toad (*Anaxyrus woodhousii*), slender glass lizard (*Ophisaurus attenuatus*), Texas garter snake (*Thamnophis sirtalis annectens*), timber (canebrake) rattlesnake (*Crotalus horridus*), wester massasauga (*Sistrurus tergeminus*), and turnip-root scurfpea (*Pediomelum cyphocalyx*).

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 assessment conducted by Freese and Nichols, Inc. reviewed the Texas Historical Commission's (THC) Archeological Sites Atlas and the USDA's Web Soil Survey to identify historic properties, documented or potential archeological sites, and cultural resources near the project area. There were 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. A survey was not required by the State Historic Preservation Officer (SHPO).

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. An initial site survey and desktop review consisting of an evaluation of federal and state environmental records review was completed for the proposed project area. No known hazardous contaminants were identified by the environmental records within the proposed limits of construction.

A search of federal and state environmental and regulatory records sources was performed by Banks Environmental Data for sites within the American Society for Testing and Materials (ASTM)-required search distances from the project boundaries. The federal environmental and regulatory records disclosed two sites within applicable search distances of the proposed WWTP, including one leaking petroleum storage tank (LPST), one hazardous waste (HW), three water wells, and four oil and/or natural gas wells. The LPST was categorized as a *Historical recognized environmental condition (REC)* and the HW as that of *Low Environmental Concern*. None of the wells had incidence of contaminated groundwater. The HW site was found to be greater than one mile from the project area.

A site visit on March 6, 2024, revealed no evidence of illicit dumping of chemicals, petroleum products, or other hazardous materials was observed within the project area. No obvious indicators of environmental contamination, such as stressed vegetation or pools of liquid, were observed within the project area. Trash was observed in one location within the project area which would be considered a “de
minimis condition” that doesn’t pose a threat to human health or the environment. No RECs or potential RECs were observed during the site visit.

The *Historical REC* associated with the leaking petroleum storage tank (LPST) site regulated by the TCEQ, which was authorized for case closure. Due to the proximity of the mapped facility to the project area (0.47 miles), residual petroleum hydrocarbon contamination may be encountered in soils and/or groundwater within the project area during construction phase activities.

The report found that any materials excavated as part of construction activities associated with the proposed project and not reused onsite should not be reused as clean fill material off-site without further testing. Any excess soil shall be properly characterized for waste disposal purposes. If chemical analysis indicated the presence of elevated concentrations of chemicals of concern, such as heavy metals or petroleum hydrocarbons, the soils should be properly disposed of in accordance with applicable regulations. If groundwater is encountered during excavation, it should be characterized for waste disposal purposes in the same manner.

The TWDB does not fund the testing, remediation, removal, disposal, or related work for contaminated or potentially contaminated materials. However, if these materials are found, they should be removed according to local, state, and federal law.

Socioeconomics

A socioeconomic analysis was performed on February 27, 2024, within a 0.5-mile radius of the project area using data from the United States Census. 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.

Area	Population	Percent Minority	Percent Below Poverty Level	Per Capita Income
State of Texas	30,029,848	58	14	$37,514
Parker County	165,834	18	7.8	$43,434
City of Aledo	5,864	17	2.3	$52,694
Project Area (0.5-mile buffer)	1,288	16	6	$46,761

The socioeconomic analysis indicates that the area within 0.5-mile of the proposed project has a higher proportion of the population with an income less than or equal to the state's official poverty level than that of the city. However, the project area percentage of the population below the poverty level is lower than that of the county and state. The per capita income for the project area is also lower than that of the city but higher than that of the county and state.

The project will require an increase in monthly service rates of approximately $18 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 affect minority or low-income populations.

Secondary and Cumulative Impacts

Secondary and cumulative impacts associated with the proposed project include temporary air quality impacts due to construction emissions, construction noise, increased odors, and the permanent cumulative effects of multiple effluent outfalls discharging into the Clear Fork Trinity River.

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 residential, agricultural, and commercial use following the construction of the project.

The project area is within an 8-hr ozone non-attainment area. Most ground-level ozone forms in the air from chemical reactions involving nitrogen oxides (NOx), volatile organic compounds (VOCs), and sunlight (U.S. EPA, 2003b). Most airborne NOx comes from combustion-related emission sources of human origin, primarily fossil fuel combustion in electric utilities, high-temperature operations at industrial sources, and operation of motor

vehicles. It is not expected that the proposed project will significantly contribute to NOx emissions in the attainment area. While WWTP processes may emit VOCs into the atmosphere, it is not expected that the project will affect ambient air quality. The most likely sources of NOx and VOC emissions would be from increased traffic and operation of construction equipment for construction of the proposed project.

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.

Odors are associated with wastewater treatment plant processes which may increase due to the expanded treatment capacity resulting from the proposed project. Dust emissions and construction noise are expected to be minor and to occur temporarily during construction. Aesthetic or scenic views would not be affected since the project occurs at the existing site which has a forested buffer between the WWTP and the nearest residents.

Eight wastewater outfalls are permitted in the Clear Fork Trinity River or in tributaries draining into the river upstream of the project site but downstream of Lake Weatherford. One wastewater outfall was identified downstream of the project site but upstream of Benbrook Lake. The accumulation of these impacts from multiple sources can compound existing stressors. 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. Small streams may be affected to a greater degree than larger bodies of water. According to Sutherland et. al. (2025), WWTP effluent in rivers with more than one plant can alter how organisms colonize a new substrate, causing a preference towards pollution tolerant species, and reducing resiliency due to decreased biodiversity.[4] Ultimately, the increase in permitted effluent into the river may contribute to the adverse cumulative effects of multiple sources of discharge in the Clear Fork Trinity River, which can alter the chemistry and habitat of a river.

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 Texas Administrative Code § 375.61, to ensure

[4] Sutherland, A.M., Wrona, F.J., and Barrett, D.C. (2025). Effects of Cumulative Municipal Wastewater Exposure on Benthic Macroinvertebrate Assemblages: An Experimental Stream Approach. *Hydrobiology*.

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. 202412299)
- 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 (USACE Project No. SWF-2009-00411).
- 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. 53000)
- United States Fish and Wildlife Service, Texas Coastal and Central Plains Ecological Services Field Office, Fort Worth Sub-office, in accordance with the Endangered

Species Act and statutes affecting other federally protected species (USFWS Project Code 2025-0045854)

- Texas Commission on Environmental Quality in accordance with 40 CFR Part 93 and National Ambient Air Quality Standards (TCEQ NEPA Request No. 2025-227).
- City of Aledo 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
- City of Aledo Mayor
- North Central Texas Council of Governments

Texas Historical Commission

The THC staff concurred with the City in correspondence dated August 6, 2024, that no direct impacts to cultural resources/historic properties are anticipated as a result of the project (THC Tracking No. 202412299).

United States Army Corps of Engineers

The USACE, Fort Worth District Office, Regulatory Branch staff were given the opportunity to review the project (USACE Project No. SWF-2009-00411). The USACE issued a No Permit Required Letter on November 13, 2024, based on an approved preliminary jurisdictional determination. 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 project will not discharge fill material into waters of the United States, including wetlands, and will not affect traditionally navigable waterways to the extent that its actions require regulatory oversight.

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 20, 2024 (TPWD Project No. 53000). The TPWD staff found that significant adverse impacts to rare, threatened, or endangered species, or other fish and wildlife resources were not anticipated.

United States Fish and Wildlife Service

The USFWS Texas Coastal and Central Plains Ecological Services Field Office, Fort Worth Sub-office, in accordance with the ESA 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 2025-0045854). The USFWS consistency letter dated May 20, 2025, issued a *May Effect* determination for the whooping crane due to potential habitat occurring within 1000 feet. Informal consultation was initiated directly with the USFWS who recommended a conservation measure but did not require formal Section 7 consultation.

Texas Commission on Environmental Quality

In a response dated July 9, 2025, 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 Parker County is currently designated nonattainment for the 2008 eight-hour ozone National Ambient Air Quality Standard (NAAQS) with a classification of severe, and is designated nonattainment for the 2015 eight-hour ozone NAAQS with a classification of serious; therefore, federal Clean Air Act, §176(c) general conformity requirements apply. Per federal general conformity regulations at 40 CFR §93.153, a conformity demonstration may be required when the total projected direct and indirect VOC and NOx emissions—precursor pollutants that lead to the formation of ozone—from an applicable federal action are equal to or exceed the *de minimis* emissions level of 50 tons per year (tpy) for ozone NAAQS serious nonattainment areas and 25 tpy for severe nonattainment areas. The TCEQ further noted that no long-term environmental impacts are anticipated as a result of the project as proposed, provided construction and waste disposal activities associated with it are completed in accordance with applicable local, state, and federal environmental permits, statutes, and regulations. The TCEQ recommended that the City take necessary steps to ensure that best management practices are used to control runoff from construction sites to prevent detrimental impact to surface and ground water.

City of Aledo Floodplain Administrator

The City's floodplain administrator was given the opportunity to review the project and identified that a floodplain development permit would be required due to work within the floodplain. Structures added into the floodplain require elevation certificates of the lowest floor. A preliminary drainage analysis will be required to ensure the additional runoff produced by the project would not overload downstream drainage facilities or cause an adverse effect.

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 Thursday, October 24, 2024, from 5:00 p.m. to 6:00 p.m., which was advertised in the *Weatherford Democrat,* a newspaper of general circulation in the service area. The notice was published on September 24, 2024, and contained information regarding availability of

planning documents, including the EID, for public review at the City of Aledo City Hall during normal business hours (9:00 a.m. to 4:00 p.m.).

The meeting occurred at the Aledo Community Center. A total of five people attended the meeting, two of whom were members of the public and not part of the project team. No comments were received at the meeting or in writing as part of the public review of the EID.

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 Expansion Project is considered environmentally sound with the following special and standard environmental conditions:

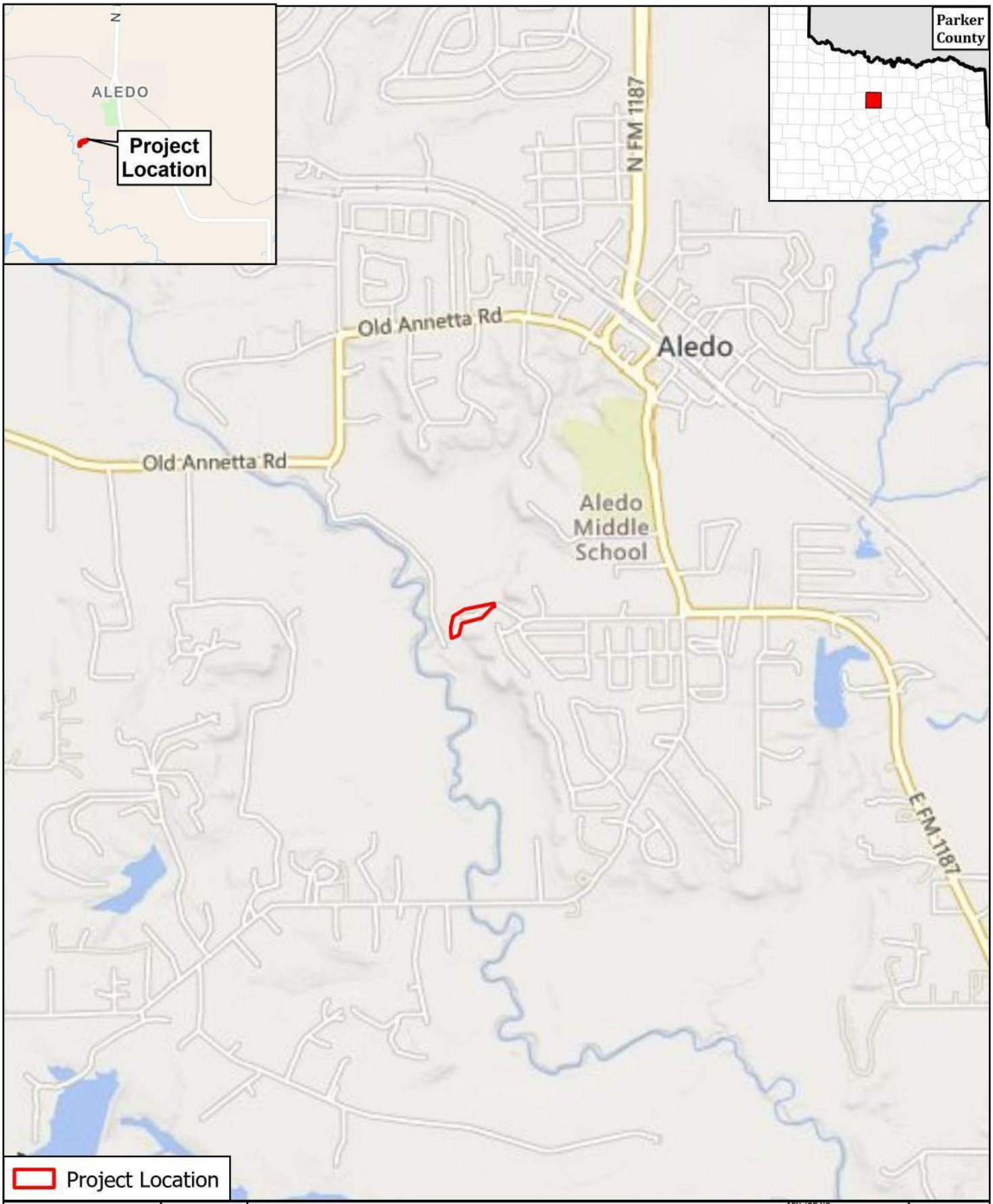
Special Environmental Conditions

- 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, across, or under a Special Flood Hazard Area, and any requirements contained therein will be adhered to.
- To ensure compliance with the Endangered Species Act (ESA) of 1973, as amended, per an agreement with the United States Fish and Wildlife Service (USFWS), to avoid potential impacts to the whooping crane (*Grus americana*), the following mitigation measures will be implemented:
    - Construction site staff will be provided with educational materials on the appearance and status of the whooping crane in order to identify individuals. Staff will monitor nearby potential habitat and if an individual is detected within 1,000 feet of a work site, work will cease until the crane has moved outside of the 1,000-foot buffer zone.
    - If a whooping crane is observed for any length of time in the project area, the USFWS Arlington Ecological Services Field Office will be notified as soon as possible.
- If the alligator snapping turtle (*Macrochelys temminckii*) or Monarch butterfly (*Danaus plexippus*) become federally listed prior to vegetation clearing and/or construction, the City of Aledo (City) will conduct additional coordination with the USFWS to ensure compliance with the ESA.

Standard Environmental Conditions

- Consistent with the TWDB Supplemental Construction Contract Conditions (TWDB-0551), the City will abide by the standard emergency condition for the discovery of cultural resources.
- Consistent with the TWDB Supplemental Construction Contract Conditions (TWDB-0551), 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.



CITY OF ALEDO

Aledo WWTP Expansion Project

Regional Location Map

0 850 1,700

Feet

FREESE AND NICHOLS
801 Cherry St, Suite 2800
Fort Worth, TX 76102
Phone - (817) 735-7300

FN JOB NO	ALO24063
FILE NAME	A1_Location_Map_8x11
DATE	8/7/2024
COORDINATE SYSTEM	NAD 1983 StatePlane Texas North Central FIPS 4202 Feet
DESIGNED	AO
DRAFTED	AO

A-1

FIGURE

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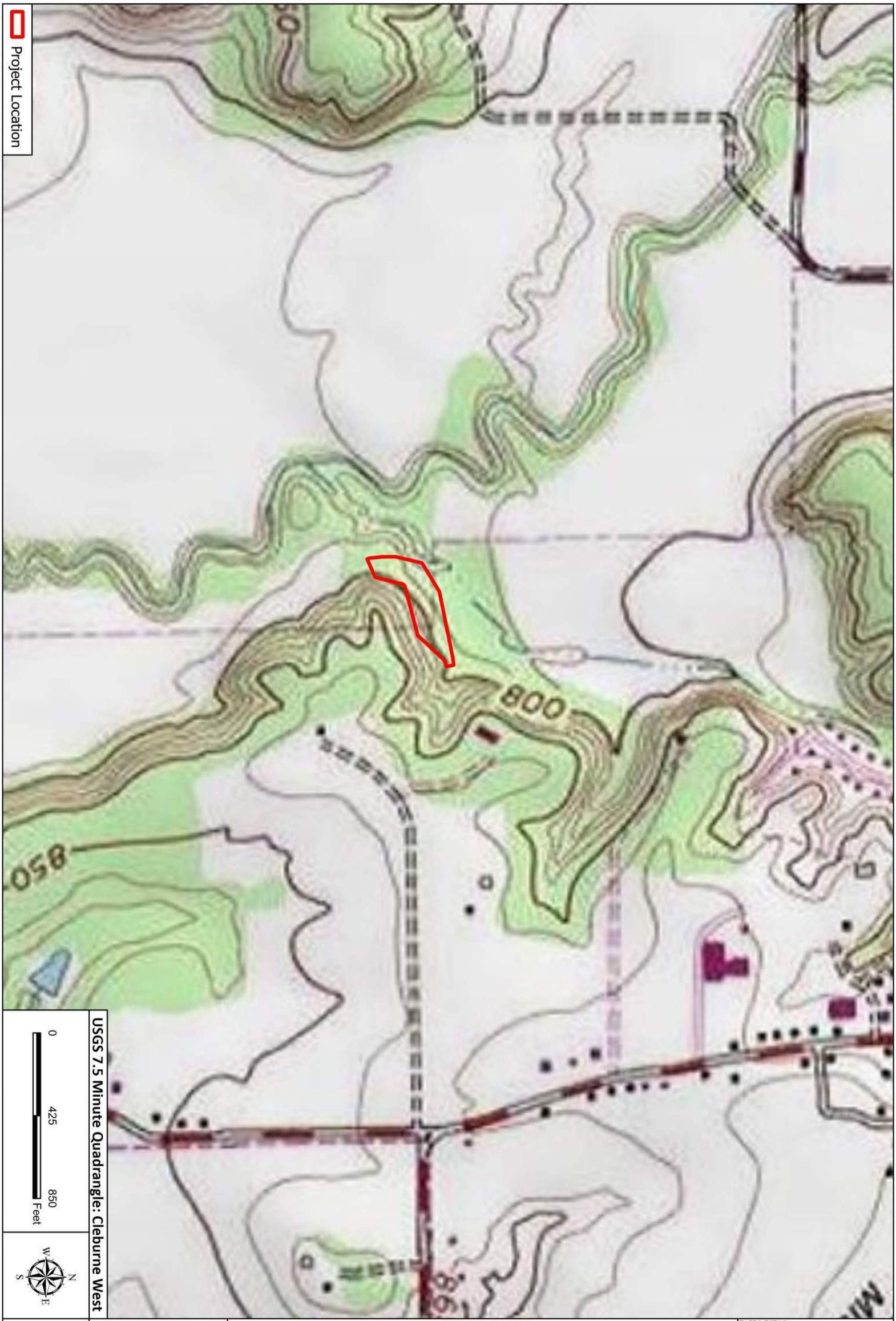

USGS 7.5 Minute Quadrangle: Cleburne West

FIGURE A-2

FREESE AND NICHOLS
801 Cherry St, Suite 2800
Fort Worth, TX 76102
Phone - (817) 735-7300

CITY OF ALEDO

Aledo WWTP Expansion Project

USGS Topographic Map

FN PROJECT NO.	ALO24063
DATE CREATED	8/7/2024
DATUM & COORDINATE SYSTEM	NAD 1983 StatePlane Texas North Central FIPS 4202 Feet
FILE NAME	A2_USGS_TOPO_11x17
PREPARED BY	AO

Project Location
100-Yr. Floodplain
500-Yr. Floodplain
NHD Flowline

Clear Fork Trinity River

Clear Fork Trinity

Taylor Ct

Barnwell Ln

Barnwell Ln

Valley View Ct

Wayne Dr

Taos Ct W

0 200 400 Feet

N W E S

CITY OF ALEDO

Aledo WWTP Expansion Project

FEMA Floodplain Map

FN PROJECT NO.	ALO24063
DATE CREATED	8/7/2024
DATUM & COORDINATE SYSTEM	NAD 1983 StatePlane Texas North Central FIPS 4202 Feet
FILE NAME	A5_Floodplain_11x17
PREPARED BY	AO

FREESE AND NICHOLS
801 Cherry St, Suite 2800
Fort Worth, TX 76102
Phone - (817) 735-7300

A-5

FIGURE

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CITY OF ALEDO

Aledo WWTP Expansion Project

NWI & NHD Map

FN PROJECT NO.	ALO24063
DATE CREATED	8/7/2024
DATUM & COORDINATE SYSTEM	NAD 1983 StatePlane Texas North Central FIPS 4202 Feet
FILE NAME	A6_NWI_NHD_11x17
PREPARED BY	AO

FREESE AND NICHOLS
801 Cherry St, Suite 2800
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A-6

FIGURE

Project Location
National Hydrography Dataset Features (NHD)
NHD Flowline
Freshwater Forested/Shrub Wetland
Freshwater Pond

0 200 400 Feet

N W E S

Path: H:\ENVIRONMENTAL\Working\AO Working\EID\EID.aprx