

November 13, 2015

TO: ALL POTENTIALLY INTERESTED PARTIES

RE: Granbury (CWSRF Project No.62673) – Surface Water Treatment Plant Improvements Project

The attached document is provided for your information. This is not a permit application and no action is required.

The attached document is an environmental determination issued by the Texas Water Development Board (TWDB) for a proposed water supply project to be funded through the TWDB. Pursuant to the environmental assessment requirements of 31 Texas Administrative Code § 371.41 of the TWDB rules, the Executive Administrator of the TWDB has determined that the action proposed in the attached documents is consistent with the National Environmental Policy Act. Coordination with the appropriate regulatory agencies and a public hearing were part of this determination.

Documentation supporting this decision is on file in the offices of the TWDB and is available for public scrutiny upon request. After evaluating the comments received, the Executive Administrator will make a final determination regarding the provision of federal financial assistance for the project; however, no action will be taken for at least thirty (30) calendar days after release of this Finding of No Significant Impact. Comments concerning this preliminary environmental determination may be submitted to the Director, Regional Water Planning and Development, Texas Water Development Board (TWDB), P.O. Box 13231, Austin, Texas 78711-3231.

November 13, 2015

FINDING OF NO SIGNIFICANT IMPACT

TO ALL INTERESTED AGENCIES AND PUBLIC GROUPS:

As required under the permanent rules of the Texas Water Development Board (TWDB), 31 Texas Administrative Code (TAC) § 371.41, the project described below has undergone an environmental review consistent with the National Environmental Policy Act (NEPA), 42 U.S. Code § 4321 *et seq.* This project is proposed to be funded through the Drinking Water State Revolving Fund (DWSRF), which is administered by the TWDB.

City of Granbury, Hood County, Texas
Surface Water Treatment Plant Project
TWDB Project Number 62673 (L1000418)
Total DWSRF Loan Amount: \$16,430,000

The City of Granbury (City), Hood County, is located 34 miles southwest of the city of Fort Worth, Texas. The City is proposing to construct a new 2.5 million gallons per day (mgd) Surface Water Treatment Plant (SWTP) to replace its existing 0.48 mgd treatment facility, which is in a deteriorated condition and lacks capacity sufficient to address the City's projected needs. The SWTP would be expandable to 7.5 mgd, allowing the City to use more of its available 13,800 acre-feet per year of raw water from Lake Granbury as it gradually reduces reliance on other water supplies. The City plans to discontinue an existing agreement to purchase approximately 1.72 mgd of treated water from the Brazos Region Public Utility Agency. With completion of the SWTP, the City will conclude the transfer of its right to the treated water to the Acton Municipal Utility District. The transfer began in 2009 and is scheduled to be completed in 2017. The new SWTP would enable the City to meet demand for potable water through 2040.

To implement the proposed project, the City is utilizing a loan with a 30-year term from the Drinking Water State Revolving Fund in the amount of \$16,430,000. These funds would cover the estimated construction costs and contingency. The City is self-funding all other expenses associated with the project, including planning, acquisition, and design.

Based on environmental information provided by the City at the time of the loan commitment, the Executive Administrator of the TWDB made a preliminary decision that preparation of an Environmental Impact Statement would not be required for this project. Instead, the City conducted an environmental review and prepared an Environmental Information Document (EID) summarizing the project's potential impact and the measures needed to avoid, reduce, or mitigate those effects. The EID was reviewed by regulatory agencies, the general public, and the staff of the TWDB following provisions of 31 TAC Chapter 371, Subchapter E, thereby fulfilling requirements of the NEPA. This environmental review is documented by the enclosed Environmental Assessment

(EA). The EA defines the mitigation conditions applicable to this project. To ensure that the proposed water system improvements will not have a significant adverse effect on the human environment or protected natural resources, the City must adhere to the following conditions.

To ensure compliance with Section 404 of the Federal Clean Water Act:

- The project must comply with the terms and conditions of Nationwide Permit 7 for Outfall Structures and Associated Intake Structures, which is valid until March 18, 2017, unless suspended, revoked, or modified prior to that date.

To ensure compliance with the Federal Migratory Bird Treaty Act (MBTA):

- Vegetation within the project area should not be cleared during the general bird nesting season, March through August. If vegetation clearing during this period cannot be avoided, the City must engage an authorized biologist to survey the area proposed for disturbance for bird nests with eggs or young. Any vegetation (trees, shrubs, and grasses) where occupied nests are located must not be disturbed until the eggs have hatched and the young have fledged.

To ensure compliance with Texas Parks and Wildlife Code, Section 68.015

- To the extent feasible, rocky shoreline habitat should not be disturbed.
- The City must inform construction workers and other field personnel regarding the potential for the protected Brazos water snake (*Nerodia harteri*) to occur in the area. If this nonvenomous species is encountered, contact should be avoided and the snake should be allowed to leave the area safely.

Standard Emergency Conditions

- Standard emergency condition for discovery of threatened or endangered species.
- Standard emergency condition for discovery of cultural resources.

Documentation supporting this determination is on file in the office of the Regional Water Planning and Development Division, TWDB, and is available for public scrutiny upon request. Comments regarding this preliminary environmental determination may be submitted to the Director, Regional Water Planning and Development, Texas Water Development Board, P.O. Box 13231, Austin, Texas 78711-3231. After evaluating all comments, the Executive Administrator will make a final assessment of the project. No action regarding the provision of federal financial assistance for the project will be taken for at least thirty (30) calendar days after release of this Finding of No Significant Impact.

Sincerely,

Finding of No Significant Impact
City of Granbury, Hood County
DWSRF 62673
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Jessica Zuba, Director
Regional Water Planning and Development

Enclosures

City of Granbury, Hood County
Drinking Water State Revolving Fund Project No. 62673
Surface Water Treatment Plant Project
Environmental Assessment

INTRODUCTION¹

The proposed project is located within the city limits of the City of Granbury (City) in Hood County, approximately 34 miles southwest of the city of Fort Worth, Texas (see attached maps). To finance construction of a new Surface Water Treatment Plant (SWTP), the City proposes to use funds from a \$16,430,000 loan (L1000418) from the State Fiscal Year 2015 Drinking Water State Revolving Fund (DWSRF). The City received a commitment from the Texas Water Development Board (TWDB) for this DWSRF loan on March 26, 2015, and closed the loan on June 26, 2015, in the full amount of the commitment.

PURPOSE AND NEED

Currently, the City obtains its raw water from wells producing from the Trinity Aquifer and from Lake Granbury, a reservoir on the Brazos River. Total well capacity is 1.80 million gallons per day (mgd). The City also has two contracts with the Brazos River Authority to withdraw an average 12.36 mgd (13,800 acre-feet per year) of water from Lake Granbury for treatment, but is utilizing only a fraction of its water right at present. Water from the lake and wells is treated in a City owned facility with a capacity of 0.48 mgd. Although the treated water meets the public drinking water standards of the Texas Commission on Environmental Quality (TCEQ) and the Environmental Protection Agency (EPA), the existing plant is 30 years old and in a somewhat deteriorated condition, and does not have the capacity to meet current or projected demands. The City offsets the resulting disparity in production of potable water by purchasing part of its treated water supply from the Brazos Region Public Utility Agency, which can provide approximately 1.72 mgd under an existing contract. Over a period of eight years, the City plans to discontinue this purchase agreement, but must develop a reliable alternative. Moreover, the City's population is projected to grow from 8,073 in 2010 to 13,914 in 2040, a 72% increase.

EVALUATION OF ALTERNATIVES

To increase its use of surface water, the City must implement an enhanced level of water treatment to amend a naturally high concentration of dissolved solids in the lake water. Conventional chemical and physical treatment processes are capable of meeting bacteriological and potability standards for drinking water, but cannot control the level of electrolytes. The primary contaminants of concern are chloride and sulfate, as well as

¹ City of Granbury (September, 2015). *Environmental Information Document—Final, Proposed Surface Water Treatment Plant Improvements*, City of Granbury, Hood County, Texas (Prepared by Enprotec/Hibbs & Todd,). Received by TWDB on September 29, 2015.

total dissolved solids. The City has therefore evaluated two water treatment options and a no-action alternative.

The two action alternatives were: pretreatment and membrane filtration followed by electro dialysis reversal; and pretreatment and membrane filtration followed by reverse osmosis. Both systems would utilize pretreatment and membrane filtration to selectively remove suspended particulates and some colloids. Pretreatment would involve the addition of a chemical coagulant and pre-disinfectant/oxidant, mixing, flocculation, and settling. To minimize the required surface area of the settling basin, the City plans to use vertical flocculators. There are three classes of filtration membranes: microfiltration; ultrafiltration; and nanofiltration. Of these filter technologies, microfiltration was found to be both effective and lowest in operation and maintenance costs. The comparison of electro dialysis reversal and reverse osmosis treatments favored the latter, which provides the higher percentage of removal of dissolved solids (90 to 99%) in the configuration described here. The reverse osmosis system produces an effluent that can be discharged into the lake in compliance with water-quality standards of the Texas Commission on Environmental Quality.

Under the no action alternative, the City would be unable to provide adequate treatment to increase system capacity relative to projected future increases in demand. In addition, the existing facilities would continue to deteriorate, potentially compromising environmental compliance.

PROJECT DESCRIPTION

After considering the alternatives for developing a new raw-water supply to meet current and projected needs, the City is proposing to build a new microfiltration/reverse osmosis water-treatment plant with an initial finished water capacity of 2.5 mgd, a new raw-water floating pump station in Lake Granbury, a new pipeline and outfall structure for discharging backwash decant effluent into the lake, and related piping, electrical systems, and controls. With phased enlargement, the plant would provide 7.5 mgd of treated water by the 2040 design year. Upon completion of the new SWTP, the City will conclude the transfer of its right to the treated water to the Acton Municipal Utility District. The transfer began in 2009 and is scheduled to be completed in 2017.

SOCIAL AND ENVIRONMENTAL CONTEXT

The social and environmental context of the proposed project area is defined by socioeconomic, physical, ecological, and historical/archeological conditions and characteristics of the affected community and surrounding region. Factors relevant to the present assessment are summarized below. Potentially adverse impact to the social and environmental fabric of the project area falls under the authority of various regulatory agencies. These agencies reviewed the project and addressed questions concerning the proposed construction (see Agency Coordination, below).

Location, Population, and Income

The project area includes parts of both the City and Lake Granbury in central Hood County, north-central Texas. This rapidly growing, medium-sized community is the county seat and a regional center for commerce and cultural events. The City is noted for its preservation of stately Nineteenth structures, particularly in the downtown and adjacent neighborhoods. Approximately 8,073 persons (2010) reside within the City and receive utility services. The population is projected to grow to 13,914 in 2040, a 72% increase. Currently (2014), more than 21% of Hood County's residents are aged 65 and older, and from 2000 to 2010, 50% of the growth in the County's population was attributed to an influx of persons 55 and older.

The local economy is based on tourism, retail sales, and real estate. Many residents commute to and from the nearby Dallas-Fort Worth metropolitan complex and the Comanche Peak Nuclear Power Plant in Somervell County to the south. Median household income (2013) was \$47,005, which is comparable to the statewide average. In December, 2014, the unemployment rate in Hood County was 3.2% compared to 4.1% in the state as a whole. The City's poverty rate is 9.7%, compared to 17.5% statewide.

Landforms

The City lies within the Grand Prairie region of the Great Plains physiographic province, characterized by low-relief to moderately rolling terrane. The Brazos River traverses this region generally from northwest to southeast, and Lake Granbury is an artificial reservoir on the river. The proposed treatment facility would be constructed on a river terrace on the left (southern) bank of one of the river's numerous meanders.

The entire project area is depicted on the United States Geological Survey's Granbury 7.5-minute topographic quadrangle map. Elevation within the proposed construction footprint ranges from approximately 690 to 720+ feet above mean sea level. Most of the project area is a low-relief river terrace. The backwash decant effluent disposal pipeline crosses the terrace to the discharge point on the river bank.

Climate

Climatic conditions in the proposed project area are subtropical subhumid with a mean annual temperature of 64 degrees Fahrenheit. Summers are hot and humid and Winters are mild to cool with occasional freezes. Precipitation is seasonally variable, peaking in May, and averaging approximately 32 inches per year. Predominant winds are southerly in all seasons, but with a significant northerly component in Autumn and Winter. The average gross lake surface evaporation is 69 inches.

Air quality is measured in relation to the United States Environmental Protection Agency (EPA) primary and secondary standards, known as the National Ambient Air Quality

Standards (NAAQS). Standards have been established for six criteria pollutants: carbon monoxide, ozone, nitrogen dioxide, lead, sulfur dioxide, and particulate matter 10 and 2.5 micrometers or less in diameter. Hood County is currently compliant with respect to all of the NAAQSs, but until recently, ozone levels exceeded the standard. To address this issue, the County participated in a voluntary program in cooperation with the EPA and by 2012 was able to bring the ozone concentrations into compliance.

Geology, Groundwater, and Soils

The geological substrate beneath the proposed construction site is mapped as Pleistocene fluvial terrace deposits consisting of gravel, sand, silt, and clay deposited by the ancestral Brazos River. The thickness of these deposits in the project area is not reported, but probably exceeds 20 to 30 feet based on data from other parts of the Brazos River valley in this region. The terrace deposits are unconformably underlain by the Lower Cretaceous Glen Rose Formation, consisting of alternating beds of limestones and marls. The Glen Rose Formation is not exposed in the project area.

Terrace deposits are often porous and permeable, and may contain groundwater at shallow depth. Groundwater is probably perched above the relatively impermeable Glen Rose strata, although the amount of shallow groundwater may be small. The Glen Rose Formation is part of the Trinity Aquifer, a major source of high-quality groundwater in some parts of the state, but the Glen Rose is not an important source locally. The Trinity Aquifer also includes the formation directly beneath the Glen Rose: the Lower Cretaceous Twin Mountains Formation comprises permeable sandstones, as well as claystones and conglomerates. Water quality in the Twin Mountains Formation in this area is low because of moderate salinity. Currently, the City obtains part of its raw-water supply from the Trinity Aquifer, but from shallower parts of the aquifer with better water quality.

Soils within the project area include the Paluxy series, a well-drained, very fine sandy loam occupying 5 to 8% slopes along the river bank and terrace margin, and the Bastrop series, a well-drained, loamy, fine sand developed on 1 to 5% slopes of the terrace surface. A typical profile of the Paluxy soil is approximately 62 inches thick. Paluxy soils are not classified as prime farm land. The typical Bastrop soil profile is: loamy fine sand from 0 to 10 inches depth; and sandy clay loam from 10 to 80 inches. All Bastrop soils are classified as prime farm land as recognized by the Natural Resource Conservation Service (NRCS). The results of coordination with this agency are discussed below (see Agency Coordination).

Surface Water, Floodplains, and Wetlands

The entire project area is located on the left bank of an impounded reach of the Brazos River's main channel. Construction of De Cordova Bend Dam downstream from the City in 1969 created the Lake Granbury reservoir, which is both the source of water to be accessed through the new raw-water floating pump station and the site of discharge of

effluent from the proposed reverse osmosis water treatment plant. The discharge point is located approximately 560 feet downstream from the intake.

Most of the proposed project area lies outside of the Zone AE Special Flood Hazard Area (100-year floodplain), although the headwall structure and erosion preventive rip-rap for the backwash decant water discharge line will be located below the ordinary high water mark elevation of 692 feet. Lake Granbury's base flood elevation is 698 feet, which would mean that the outfall could be inundated by a rise in lake level. The proposed floating intake structure would rise and fall with the lake level, and transfer water from the lake surface to the pretreatment systems via an 18-inch pipe. This pipe will be above grade within the 100-year flood plain, but buried from there to the pump station. The electrical gear for the intake will be installed on the shore above the elevation of the 100-year floodplain.

Based on data from the United States Fish and Wildlife Service's National Wetlands Inventory, as well as a review of the proposed project by the United States Army Corps of Engineers, there are no statutory wetlands within the proposed project area other than the lake. The potential impact of construction and operation of the water system within the lake were addressed during coordination with the required regulatory agencies (see Agency Coordination, below).

Flora and Fauna

The proposed project area is located within the Limestone Cutplain subregion of the Cross Timbers ecological region. The floral habitats of this subregion include forest, woodland, savanna, and prairie. Post oak, shin oak, cedar elm, Texas ash, plateau live, oak, and bur oak are the predominant native trees, and big bluestem, little bluestem, yellow indiangrass, silver bluestem, Texas wintergrass, tall dropseed, sideoats grama, and common curlymesquite are the principal grasses. Riparian woodlands covered the project area before the near complete removal of vegetation for agriculture prior to the 1940s. Subsequent commercial and industrial development and the close proximity to highways and a railway line fragmented and reduced the viability of the land as a natural habitat.

Because of habitat disruption in the proposed project area, wildlife likely to be found there would primarily include species tolerant of human activity and highly mobile species. The most common mammals in Hood County are white-tailed deer, raccoon, opossum, striped skunk, fox squirrel and other small rodents, several species of bats, armadillo, grey fox, ringtail, coyote, and bobcat, although only a few of the smaller mammals are likely found in the project area today. Numerous small birds and birds of prey occupied the riparian woodlands when they were intact, but the number has declined. Both migratory and non-migratory waterfowl continue to utilize the lake and lakefront, as do many reptiles, amphibians, fish, and invertebrates.

Databases maintained by the United States Fish and Wildlife Service and Texas Parks and Wildlife Department were reviewed to identify the state and/or federally listed

threatened or endangered species that occur or have occurred historically in Hood County. Some of the listed species are migrants or are considered extirpated in the county, but there are no known habitats of threatened or endangered species in the project area,

The following table lists the federal and state listed endangered, threatened, or rare species in Hood County as reported by the Texas Parks and Wildlife Department.

Federal- and/or State-Listed Endangered, Threatened, or Rare Species

	Birds	Federal Status	State Status
American Peregrine Falcon	<i>Falco peregrinus anatum</i>	DL	T
Artic Peregrine Falcon	<i>Falco peregrinus tundrius</i>	DL	T
Peregrine Falcon	<i>Falco peregrinus</i>	DL	T
Whooping Crane	<i>Grus americana</i>	LE	E
Bald Eagle	<i>Haliaeetus leucocephalus</i>	DL	T
Black-capped Vireo	<i>Vireo atricapilla</i>	LE	E
Golden-cheeked Warbler	<i>Setophaga chrysoparia</i>	LE	E
Interior Least Tern	<i>Sterna antillarum athalassos</i>	LE	E
Sprague's Pipit	<i>Anthus spragueii</i>	C	
Western Burrowing Owl	<i>Athene cunicularia hypugaea</i>		
Baird's Sparrow	<i>Ammodramus bairdii</i>		
Mountain Plover	<i>Charadrius montanus</i>		
	Fishes		
Sharpnose shiner	<i>Notropis oxyrhynchus</i>	C	
Smalleye shiner	<i>Notropis buccula</i>	C	
	Mammals		
Black bear	<i>Ursus americanus</i>	T/SA	T
Plains spotted skunk	<i>Spilogale putorigv interrupta</i>		
Gray wolf	<i>Canis lupus</i>	LE (extirpated)	E
Red wolf	<i>Canis rufus</i>	LE (extirpated)	E
	Mollusks		
Texas fawnsfoot	<i>Truncilla macrodon</i>	C	T
	Reptiles		
Texas horned lizard	<i>Phrynosoma cornutum</i>	NL	T
Brazos water snake	<i>Nerodia harteri</i>		T
Texas garter snake	<i>Thamnophis sirtalis annectens</i>		T
Timber rattlesnake	<i>Crotalus horridus</i>		T
	Plants		
Comanche Peak prairie-clover	<i>Dalea reverchonii</i>		
Glen Rose yucca	<i>Yucca necopina</i>		

LE – Federally Listed Endangered

T/SA – Federally Listed Threatened (because of Similarity of Appearance)

C – Federal Candidate for Listing (formerly Category 1 Candidate)

DL – Federally Delisted

NL - Not Federally Listed

E, T – State Listed Endangered/Threatened

“Blank” - Rare, but with no regulatory listing status

Archeology and History

The City of Granbury is noted for the many restored Nineteenth Century structures in its commercial center and downtown neighborhoods, located north of the Brazos River. A review of the Texas Historical Commission's (THC's) Texas Archeological Sites Atlas disclosed the presence of a single known archeological site, 41HD11, in the proposed project area. This site had already been disturbed when found and the investigator reported that planned construction activities and ongoing looting could cause further damage. The eligibility of the site for listing on the National Register of Historic Places and designation as a State Antiquities Landmark was, however, undetermined, and the THC advised the City to conduct an archeological survey of the part of the project area near the site. The survey was completed and the results of the investigation are discussed below (see Agency Coordination). There are no other known archeological or historical sites or protected cultural resources within the project area.

Demography and Environmental Justice Analysis

The City is a small, but rapidly growing community on the rural outskirts of the Dallas-Fort Worth metropolitan complex. In 2010, the City's population was approximately 8,073. The total areal extent of the City is 12.89 square miles, indicating an average population density of 626.3 persons per square mile. A relatively high percentage of the population, 25.7%, is 65 years old or older, and 19.0% are younger than 18 years. These statistics help to explain the low number of persons per household, 2.12. The population is projected to grow to 13,914 by 2040, a 72% increase, but 50% of the estimated growth is attributed to an expected influx of persons 55 and older.

Median household income in 2013 was \$47,005, which was below the statewide average, \$51,900, in the same year. Per capita income was \$29,105, which exceeded the mean for the state, \$26,019, by 11.9%. In December, 2014, the unemployment rate in Hood County was 3.2% and 4.1% throughout the state. The City's poverty rate is 9.7%, compared to 17.5% statewide. Approximately 88.1% of households comprise non-Hispanic residents, whereas the comparable figure for the state as a whole is 45.3%. The City's remaining households are 8.6% Hispanic and 3.3% other minorities and mixed races.

<u>Area</u>	<u>Population (2013)</u>	<u>% Minority (2010)</u>	<u>Poverty Rate (2013), Median Household Income (2013)</u>
State	26,448,193	54.7%	17.6%, \$51,900
City	8,779	11.9%	9.7%, \$47,005
Project area	0	0	NA, NA

The proposed project area and surroundings are non-residential and most of the construction would occur at the existing water treatment plant site. Therefore, project implementation is not expected to be incompatible with current land use or to affect low-income or minority populations disproportionately.

The project would have only a moderate impact on the City's utility rate payers despite a resulting 43.7% increase in per capita debt. Approximately 84% of the total debt would be repaid through utility system revenue, whereas the balance of the debt service would be met with tax revenue. The current average monthly water and wastewater bill is \$123.32. The City does not anticipate an increase in utility rates due to the proposed project.

POTENTIAL IMPACTS AND MITIGATIVE MEASURES

The potential environmental impact of the City's proposed water system improvements includes effects common to most construction projects comparable in type, size, and duration, as well as those related to unique attributes of the project area. To ensure due consideration of these effects, the City conducted a full environmental assessment of the project, held an open meeting to familiarize the community with the project and solicit public comment, and coordinated with regulatory agencies and other interested parties to define measures needed to avoid, minimize, or mitigate adverse impact. The City has provided assurance that these measures will be implemented in a manner consistent with the requirements of state and federal regulatory agencies and rules of the TWDB.

“Cross-Cutter” Compliance

In accordance with procedures provided in 31 TAC § 371.41, the proposed project has been reviewed for potential adverse effects on the quality of the human environment and protected natural resources. Authority for this review ultimately derives from the federal statutes, executive orders, and implementing regulations (“cross-cutters”) listed below, as identified by the United States Environmental Protection Agency.

- (1) National Environmental Policy Act of 1969, 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; and;
(20) Clean Water Act, PL 92-500, as amended.

Agency Coordination

Requirements of the DWSRF and federal and state regulations include coordination with state and federal regulatory agencies and other stakeholders and interested parties regarding a project's potential impact. The environmental review of the City's proposed water system improvement project included coordination with eleven agencies and others, all but three of which responded directly. Below is a summary and discussion of comments and recommendations from these entities and conditions that will pertain to the project during construction.

The City coordinated with the following federal and state regulatory agencies and other entities:

- United States Army Corps of Engineers, Regulatory Branch, Fort Worth District, Fort Worth;
- United States Department of the Interior, Fish and Wildlife Service, Ecological Services, Arlington Field Office, Arlington;
- United States Department of the Interior, National Park Service, Intermountain Region External Review Team, Denver, Colorado;
- United States Department of Agriculture, Natural Resources Conservation Service, Temple;
- United States Department of Agriculture, Forest Service, Atlanta, Georgia;
- Federal Emergency Management Agency, Denton;
- Texas Parks and Wildlife Department, Wildlife Habitat Assessment Program, Austin;
- Texas Historical Commission, State Historic Preservation Officer, Austin;
- Texas Commission on Environmental Quality;
- North Central Texas Council of Governments;
- City of Granbury Floodplain Administrator, Granbury.

United States Army Corps of Engineers

On January 27, 2015, the City asked the United States Army Corps of Engineers (USACE) to review the proposed project. Under Section 404 of the Clean Water Act, the USACE regulates the discharge of dredged and fill material in waters of the United States, including wetlands. USACE responsibility under Section 10 of the Rivers and Harbors Act of 1899 includes regulation of activities in, or affecting, navigable waters of the United States. In its initial response on February 10, 2015, the USACE assigned the project number SWF-2015-00050. On March 4, 2015, after requesting and receiving additional information, the USACE determined that the project is authorized under Section 404, Nationwide Permit 7 for Outfall Structures and Associated Intake

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City of Granbury, Hood County
DWSRF 62673

Structures. This permit is valid until March 18, 2017 unless suspended, revoked, or modified prior to that date.

United States Department of the Interior, Fish and Wildlife Service

On June 1, 2015, the City asked the United States Fish and Wildlife Service (USFWS) to review the proposed project, but the USFWS did not respond. The City's DWSRF loan is conditioned that if threatened or endangered species are discovered during construction, work will cease immediately in that part of the project area and the City will notify the USFWS and the TWDB of the discovery. The USFWS will then determine what actions may be necessary.

United States Department of the Interior, National Park Service

On April 3, 2015, the City asked the National Park Service (NPS) to review the proposed project. The NPS responded on April 23, 2015, stating that it had no comment on the project at that time.

United States Department of Agriculture, Natural Resources Conservation Service

On February 16, 2015, the City asked the Natural Resources Conservation Service (NRCS) to review the proposed project. The NRCS conducted its review in accordance with the Farmland Protection Policy (FPP) Act, and on April 2, 2015, stated that because all construction would occur within either the existing treatment facility or areas that are not prime farmland, the project is exempt from FPP regulations.

United States Department of Agriculture, Forest Service

On June 1, 2015, the City asked the Forest Service (FS) to review the proposed project, but the FS did not respond.

Federal Emergency Management Agency and City of Granbury Floodplain Administrator

On January 27, 2015, the City asked the Federal Emergency Management Agency (FEMA) to review the proposed project. The FEMA responded on February 4, 2015, requesting that the City contact the local floodplain administrator, and that the project comply with Executive Orders 11988 11990, concerning floodplain management and protection of wetlands, respectively. The City had already contacted the Hood County floodplain manager, who advised the City that because the project area was entirely within the City limits, the appropriate contact would be the City's floodplain administrator. On May 29, 2015, the administrator stated that the proposed project would have no impact on the floodplain.

Texas Parks and Wildlife Department

On January 27, 2015, the City asked the Texas Parks and Wildlife Department (TPWD) to review the proposed project. The TPWD responded on March 6, 2015, and provided a series of comments and recommendations. In a letter dated June 1, 2015, the City accepted and agreed to implement all of the TPWD's following recommendations.

To ensure compliance with the Federal Migratory Bird Treaty Act (MBTA):

If migratory bird species are found nesting on or adjacent to the project area, they must be dealt with in a manner consistent with the MBTA. TPWD recommends excluding vegetation clearing activities during the general bird nesting season, March through August, to avoid adverse impacts to this group. If clearing vegetation during the migratory bird nesting season is unavoidable, TPWD recommends the City survey the area proposed for disturbance to ensure that no nests with eggs or young will be disturbed by operations. Any vegetation (trees, shrubs, and grasses) where occupied nests are located should not be disturbed until the eggs have hatched and the young have fledged.

To ensure compliance with Parks and Wildlife Code, Section 68.015

TPWD recommends the City avoid disturbing rocky shoreline habitat to the extent feasible. In addition, because snakes are generally perceived as a threat and killed when encountered, TPWD recommends the City inform staff of the potential for the protected Brazos water snake (*Nerodia harteri*) to occur in the area. Staff should avoid contact with this nonvenomous species if encountered and allow the snake to safely leave the area.

In addition to these recommendations, the TPWD noted that under TPWD Code 86, trenching or other disturbance of state-navigable streambeds and removal of streambed materials may require a permit from TPWD. On March 6, 2015, the City contacted TPWD's Sand and Gravel Permit Program Administrator regarding the proposed construction. The TPWD responded later that day, stating that the project would not require a permit from TPWD. The TPWD also offered two recommendations that the City had addressed previously: consultation with the USACE regarding potential effects on wetlands; and referral to the TPWD's list of rare, threatened, and endangered species in Hood County.

The City's DWSRF loan is conditioned that if threatened or endangered species are discovered during construction, work will cease immediately in that part of the project area and the City will notify the TPWD and the TWDB of the discovery. The TPWD will then determine what actions may be necessary.

Texas Historical Commission

On February 23, 2015, the Texas Historical Commission (THC) was asked to review the proposed project. The THC did so in accordance with Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas. Following its initial review, the THC determined that the proposed backwash decant effluent discharge pipeline would lie very close to a known archeological site with undetermined eligibility for listing on the National Register of Historic Places and as a State Antiquities Landmark. The THC therefore directed the City to conduct an archeological survey of that part of the project area. The survey was completed by a professional archeologist operating under Antiquities Permit number 7273, and a report was submitted to the THC for review. No

cultural materials were recovered during the survey and the archeologist recommended that the project should be allowed to proceed. The THC accepted the archeological report and concurred with the recommendation on July 7, 2015.

The City's DWSRF loan is conditioned that if cultural resources are discovered during construction, work will cease immediately in that part of the project area and the City will notify the THC and the TWDB of the discovery. The THC and TWDB will then proceed in accordance with the regulations of the Advisory Council on Historic Preservation (36 CFR Part 800) prior to taking any action which might affect the cultural resources.

Texas Commission on Environmental Quality

On January 27, 2015, the City asked the Texas Commission on Environmental Quality (TCEQ) to review the proposed project. The TCEQ designated the coordination as NEPA Request #2015-011, and stated that a review of the project for general conformity impact in accordance with 40 CFR Part 93 indicates that Hood County is currently unclassified or in attainment of the National Ambient Air Quality Standards for all six criteria air pollutants. Therefore, general conformity rules do not apply. The TCEQ stated that any construction debris or waste should be discarded at an appropriately authorized disposal facility.

North Central Texas Council of Governments

On January 27, 2015, the City asked the North Central Texas Council of Governments (NCTCG) to review the proposed project, but the NCTCG did not respond.

Public Participation

Public participation conducted during facilities planning included a public hearing held on August 31, 2015. A notice of the impending meeting was published more than 30 days earlier in the *Hood County News*, a newspaper of general circulation in the service area. The notice, which was published on July 22, 2015, also contained information regarding the availability of planning documents, including the EID, for public review at the City of Granbury City Hall during normal business hours. Separate written notices of the hearing and the availability of the documents for review were sent to selected state and federal agencies.

The public hearing was held at 10:00 A.M. on August 31, 2015, at the City of Granbury City Hall. No adverse comments were voiced at the public hearing or received during the 30-day public review period.

RECOMMENDATIONS

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

Environmental Assessment
City of Granbury, Hood County
DWSRF 62673

Based on a review of the Environmental Information Document and other records, the Surface Water Treatment Plant Project proposed by the City is considered to be environmentally sound with the following recommended conditions.

To ensure compliance with Section 404 of the Federal Clean Water Act:

- The project must comply with the terms and conditions of Nationwide Permit 7 for Outfall Structures and Associated Intake Structures, which is valid until March 18, 2017, unless suspended, revoked, or modified prior to that date.

To ensure compliance with the Federal Migratory Bird Treaty Act (MBTA):

- Vegetation should not be cleared during the general bird nesting season, March through August. If vegetation clearing during this period cannot be avoided, the City will engage an authorized biologist to survey the area proposed for disturbance for bird nests with eggs or young. Any vegetation (trees, shrubs, and grasses) where occupied nests are located must not be disturbed until the eggs have hatched and the young have fledged.

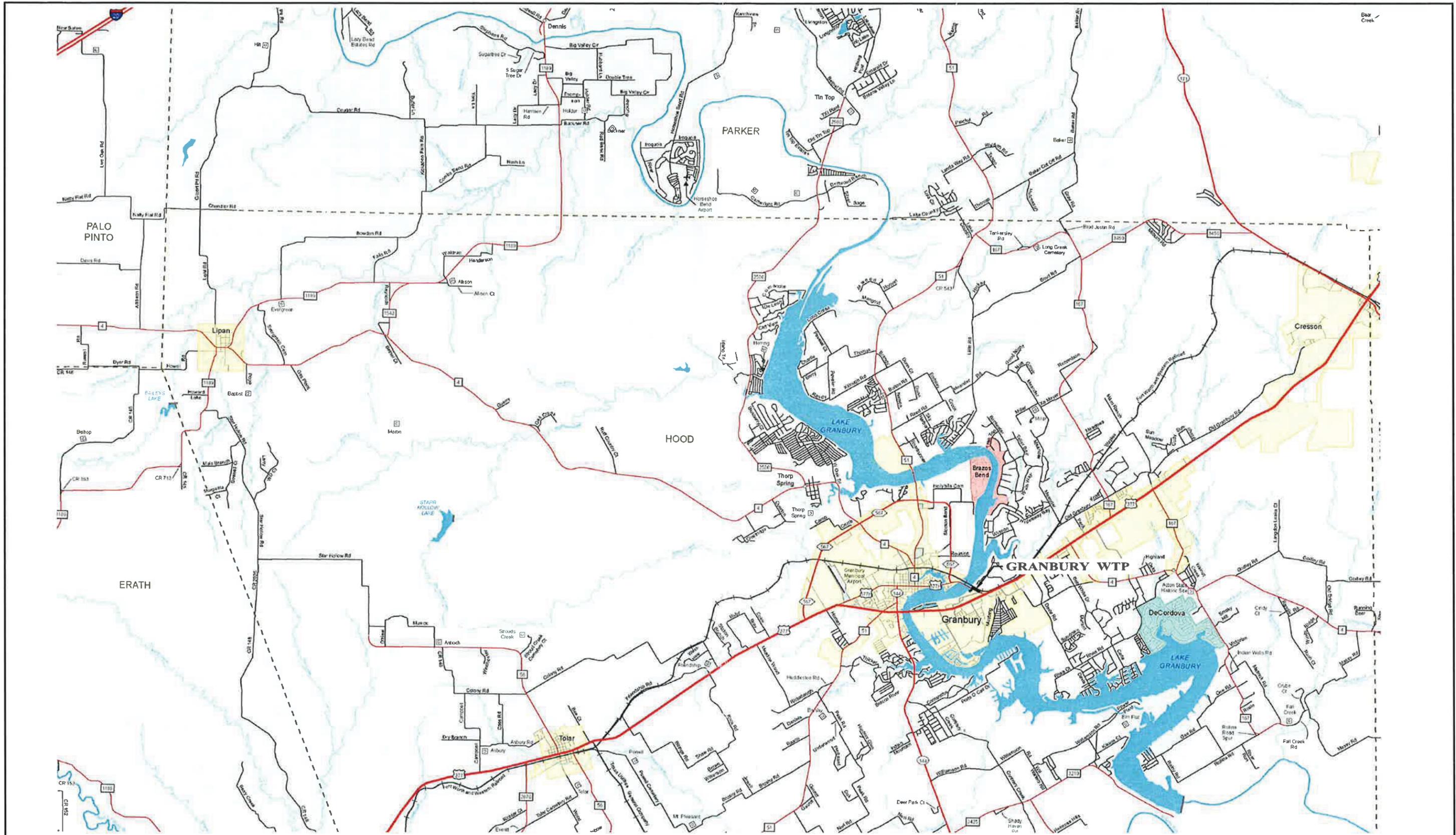
To ensure compliance with Texas Parks and Wildlife Code, Section 68.015

- To the extent feasible, rocky shoreline habitat should not be disturbed.
- The City will inform construction workers and other field personnel regarding the potential for the protected Brazos water snake (*Nerodia harteri*) to occur in the area. If this nonvenomous species is encountered, contact should be avoided and the snake should be allowed to leave the area safely.

Standard Emergency Conditions

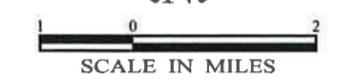
- Standard emergency condition for discovery of threatened or endangered species.
- Standard emergency condition for discovery of cultural resources.

With these conditions, I recommend that the Executive Administrator issue a Finding of No Significant Impact for the City of Granbury's proposed Surface Water Treatment Plant Project as specified above.



SOURCE OF MAP: TEXAS COUNTY MAP FIGURE 1

GENERAL LOCATION MAP
 PROPOSED WTP IMPROVEMENTS
 1560 EAST PEARL STREET
 GRANBURY, HOOD COUNTY, TEXAS



eht ENPROTEC/HIBBS & TODD, INC.
 ENVIRONMENTAL AND CIVIL ENGINEERING
 402 Cedar Street
 Abilene, Texas 79601
 PE Firm Registration No. 1181
 PG Firm Registration No. 50103
 RPLS Firm Registration No. 10011900 & 10007300

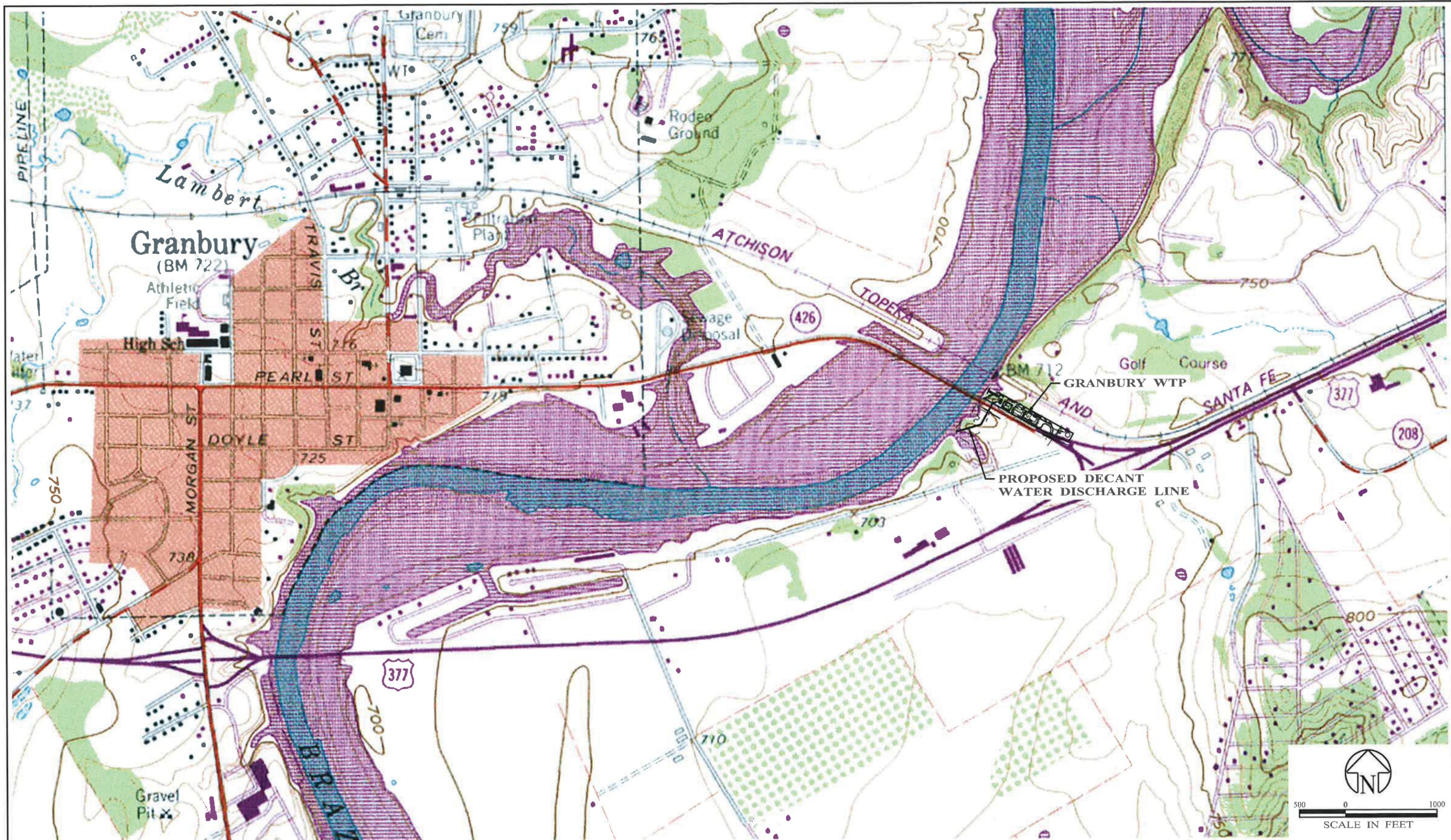
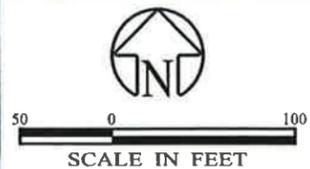


FIGURE 10
 SOURCE OF MAP:
 GRANBURY QUADRANGLE, TEXAS-HOOD COUNTY (1961)

USGS TOPOGRAPHIC MAP
 PROPOSED WTP IMPROVEMENTS
 1560 EAST PEARL STREET
 GRANBURY, HOOD COUNTY, TEXAS

07-4227

12/19/2014



SOURCE OF MAP: TNRS 2012

**AERIAL PHOTOGRAPH
(PHOTOGRAPH KEY)**
 PROPOSED WTP IMPROVEMENTS
 1560 EAST PEARL STREET
 GRANBURY, HOOD COUNTY, TEXAS

07-4227

01/27/2015