

March 4, 2016

CATEGORICAL EXCLUSION

TO ALL INTERESTED AGENCIES AND PUBLIC GROUPS:

In accordance with the Texas Water Development Board (TWDB) environmental review process established at 31 Texas Administrative Code (TAC) Chapter 375, Subchapter E, for projects to be funded through the Clean Water State Revolving Fund (CWSRF) Program and consistent with the National Environmental Policy Act, 42 U.S. Code §4321, et seq., the Executive Administrator of the TWDB has determined that the proposed action identified below may be exempted from formal environmental review requirements:

San Antonio Water System, Bexar County, Texas
Sanitary Sewer Overflow Reduction and Rehabilitation Project
CWSRF Project No. 73664
Total TWDB Commitment: \$60,100,000

The San Antonio Water System (SAWS) is proposing to use funding from a \$60,100,000 CWSRF Non-equivalency Program loan to continue improving its sewer system within its service area. The proposed rehabilitation and improvements are part of a larger, Sewer System Overflow (SSO) reduction program. Specifically, SAWS plans to 1) rehabilitate approximately 25,000 feet of 18-inch to 60-inch gravity sewer main; and, 2) install approximately 7,500 feet of new 36-inch and 42-inch gravity sewer pipe.

On May 8, 2013, a Determination of No Effect (DNE) was issued for the project for similar project components that consisted of rehabilitation of pipelines at ten locations within the SAWS wastewater collection system. SAWS is proposing to use remaining funds from the CWSRF Program loan committed by the TWDB on July 18, 2013, for the construction of the SSO Reduction and Rehabilitation project. The estimated cost for the proposed project is \$25,000,000.

The proposed project, identified by SAWS as C-13: Interceptor Project, is located in downtown San Antonio and consists of two alignments, the Broadway Line and the North Alamo Line. The Broadway Line includes the rehabilitation of existing sewer lines along Broadway Avenue, Avenue B, McCullough, Lasoya, South Alamo, and South St. Mary's Street. The North Alamo Line includes the rehabilitation of existing sewer lines, and the installation of a parallel sewer line, along Avenue B, Josephine Street, North Alamo, 6th Street, and Elm Street. The North alignment also involves the removal of existing facilities, including sewer lines and approximately 19 manholes. The project intends to increase sewer capacity and efficiency in these locations of the sewer system.

The project is expected to require three construction packages in order to minimize disruptions to downtown San Antonio operations. During the alternatives analysis for the project, it was determined that a combination of rehabilitation with the installation of a smaller parallel sewer line was the most cost effective method to address the existing capacity and condition issues. The parallel line will be installed within existing City of San Antonio right-of-way, within areas previously disturbed by the installation of other utilities.

The project does not anticipate adverse impacts to state or federally listed protected species. SAWS' consultant performed a review of rare, threatened and endangered species occurrence information maintained by the Texas Parks and Wildlife Department's Natural Diversity Database on January 12, 2012. Results of the database search indicated that no federally listed threatened or endangered species have been documented to occur within 1.5 miles of the project. Additionally, a field evaluation by SAWS' consultant ecologists was completed in January 2012 and determined that suitable habitat sufficient to support any of the federal or state listed species was not present within the project limits. The project area is not located within any karst zones that are known to support the federally listed species. Also, because the project will be constructed above the confined layers of the Edwards Aquifer, there will be no impacts to aquifer-dwelling species. Therefore, based on the results of database search and field assessments, the project is not likely to adversely impact federal or state listed species or their habitat.

SAWS does not anticipate adverse impacts to waters of the United States and wetlands. In 2010, the City's consultant performed an assessment to determine the existing conditions and potential environmental constraints for the proposed project. The assessment found three features identified on the National Wetland Inventory (NWI) map that occur within the project area. One of the features is defined as Palustrine/Unconsolidated Shore/Temporarily Flooded/Diked or Impounded (PUSAh), field observations indicated that this feature is a shallow depression likely fed by surface runoff during rain events. The other two features are defined as Palustrine/Unconsolidated Bottom/Permanently Flooded/Diked or Impounded (PUBHh), these refer to impounded areas within Leon Creek without a bedrock bottom. The City anticipates performing bores under Leon Creek and unnamed streams and tributaries in order to eliminate any potential impact to these features. The replacement of sewer lines in the existing right-of-ways should not represent any potential impact to the identified features in the project area.

The project is outside the Edwards Aquifer Contributing, Recharge and Transition Zones. Due to the shallow depth of the construction trenching, minimal or no impacts to groundwater quantity or quality are expected. Furthermore, the proposed project includes only the rehabilitation of existing sewer lines and installation of sewer lines within areas previously disturbed, the project is not likely to adversely impact the Edward's Aquifer.

Most of the proposed alignment is located on the 100-year flood plain. SAWS plans to obtain and maintain compliance with the City of San Antonio's Floodplain Development Permit. Prior to construction, SAWS shall obtain a Floodplain Development Permit. Obtaining this permit and adherence to its special provisions has been included as special condition of this determination.

According to the Cultural Resources Report for the project submitted in February 2012, approximately 40 percent of the project area has been recommended as having a probability for containing historic archeological sites. These locations are concentrated in the central portion, but also include possible acequia locations in the northern and southern areas of the project. The City of San Antonio's Office of Historic Preservation (COSA) and the Texas Historical Commission (THC) have recommended that these locations be monitored by a qualified archeologist during construction. Per SAWS's consultation with the City of San Antonio's

Office of Historic Preservation, it is anticipated that monitoring of ground-disturbing activity in areas of concern will require a team of 2-3 archeologists. If excavations in these areas occur simultaneously, more than one team may be required. The COSA and the THC also provided the general guidelines for archeological monitoring of construction activities. The THC issued an Archeological Permit # 7026 for the construction monitoring project on September 16, 2014.

In order to insure compliance with the Antiquities Code of Texas the terms and conditions included in the Archeological Permit #7026, and general guidelines for archeological monitoring of construction activities have been included in the CWSRF loan conditions for the proposed project.

TWDB staff concurs that the project qualifies for a categorical exclusion because the work is functional replacement of sewer lines and installation of a parallel sewer line in existing row-of-ways with a minor capacity increase in the existing service area. No permit modifications will be required for this project. All proposed work will be performed on previously disturbed sites. Therefore, environmental impacts should be similar to rehabilitation activities and limited to those associated with excavation and pipe installation.

This decision is allowed because the specified project elements should not entail significant adverse impacts to the quality of the human environment. Documentation supporting this determination is on file at the TWDB.

This determination may be rescinded if it is found that:

- (1) The project no longer meets the requirements for a CE as a result of changes in the project;
- (2) The project involves extraordinary circumstances as defined in 31 TAC Section 375.61; or
- (3) The project may violate or has violated federal, state, local, or tribal laws.

The project must comply with the following condition:

- Prior to construction activities SAWS shall obtain a Floodplain Management Development Permit and maintain compliance with its special provisions regarding construction activities located in the 100-year floodplain zone; and,
- Construction monitoring by a professional archeologist shall be required for specific areas identified by the City of San Antonio's Office of Historic Preservation (COSA) and the Texas Historical Commission (THC), per permit #7026, and in accordance with the General Guidelines for Archeological Monitoring of Construction Activities.

The project also must comply with the following standard emergency conditions:

- Standard emergency condition for the discovery of cultural resources; and,
- Standard emergency condition for the discovery of threatened and endangered species.

Comments regarding this determination may be submitted to the Director of Regional Water Planning and Development, Texas Water Development Board, P.O. Box 13231, Austin, Texas 78711-3231.



C-13 Project Revised Project Limits

