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) § 371.41, 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 Drinking Water State Revolving Fund (DWSRF) program, which is administered by the TWDB.

Greenbelt Municipal and Industrial Water Authority, Clarendon, Donley County, Texas
TWDB DWSRF Project No. 62935
Develop Additional Water Supplies from the Ogallala Aquifer Project
Total Financing Amount: $18,110,000
Loan Nos. L1001617, LF1001618

The Greenbelt Municipal and Industrial Water Authority (Authority) is proposing to use $18,110,000 in financing from the DWSRF program for the Develop Additional Water Supplies from the Ogallala Aquifer Project to design and construct: 1) three groundwater-supply wells; 2) a 12-mile, 16-in diameter raw-water transmission pipeline; 3) pipeline connections at the Authority's existing treatment plant; and 4) caustic storage and dosing system at the treatment plant. The project will diversify and augment the Authority's existing raw water supplies to meet current and future demands.

Expected production from the three permanent groundwater wells required prior well testing. Five potential well sites were considered, pilot holes were bored at all five locations, and one permanent well was installed for constant rate flow testing. The well testing phase included construction of permanent roads to the proposed well sites, well drilling, and aquifer testing. Funding for these activities was provided by the TWDB through the present loans during the initial part of the planning phase of this project. The Authority used some of the planning funds to assess the potential environmental impact of the activities, for which the TWDB issued a Categorical Exclusion on November 26, 2024.

For the current phase of the project, the Authority performed a separate, comprehensive impact assessment and prepared the Environmental Information Document that forms the basis for this Finding of No Significant Impact (FONSI). The Authority's assessment is consistent with NEPA following the guidelines provided in 31 TAC § 371.45, and the results are described in the accompanying Environmental Assessment (EA). The EA contains mitigative environmental conditions that will be applied throughout construction 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. Construction will occur at the test-well sites and existing water treatment facility and within the

alignment of a new raw-water transmission pipeline. Most of the raw-water line is proposed to be constructed with open-cut trenching techniques, but trenchless methods (directional boring) will be employed at specified stream crossings to avoid disturbance of the banks and channels.

Based on a detailed environmental review of planning information, the Environmental Information Document, and other data, the project is environmentally sound with the following special and standard environmental conditions:

Special Environmental Conditions

- Consistent with Section 404 of the Clean Water Act, the proposed project will avoid impacts to potential Waters of the United States, including wetlands. The raw-water transmission pipeline will be installed by means of horizontal boring or comparable trenchless construction methods at all significant stream crossings, specifically the Salt Fork Red River, Caroll Creek, and two other, unnamed streams located north of the river, with bore pits located outside the Ordinary High Water Mark in compliance with the terms and conditions of United States Army Corps of Engineers Nationwide Permit 58 for Utility Line Activities for Water and Other Substances (USACE No. SWT-2026-00166). A Stormwater Pollution Prevention Plan (SWPPP) will be implemented by the contractor with best management practices (BMPs) in place prior to construction to minimize dust, sedimentation, erosion, and pollution to surface waters.

- Consistent with Executive Order (EO) 11988 as amended by EO 13690, and Texas Water Code Section 16.315, the Greenbelt Municipal and Industrial Water Authority (Authority) must, to the extent possible, avoid adverse impacts affecting the 100-year floodplain. Although none of the project area encompasses a FEMA mapped floodplain, impact avoidance remains the responsibility of DWSRF funding recipients. The Authority will avoid permanent impacts to floodplains and floodways by utilizing directional boring or comparable trenchless methods for pipeline construction at the four principal stream crossings: Salt Fork Red River; Carroll Creek; and two unnamed tributaries north of the river. Following construction, pipeline easements will be returned to pre-construction contours, resulting in no change in the flood elevation. Should the Authority require information regarding the extent of the 100-year floodplain along a stream in its project area, Federal Emergency Management Agency (FEMA) guidelines state the floodplain may be approximated using “best available data.” In addition, FEMA and the TWDB provide a useful online tool for floodplain approximation based on “Base Level Engineering” data and procedures.

- Consistent with the Migratory Bird Treaty Act, Endangered Species Act of 1973, as amended, and Texas Parks and Wildlife Code Chapters 64, 65, 67, and 68, vegetation clearing must be excluded during the general bird nesting season, March 15 through September 15, to avoid adverse impacts to breeding birds. If vegetation clearing during this time is unavoidable, the area proposed for disturbance will be surveyed by a qualified biologist to identify occupied nests, not more than five days prior to clearing activities. If occupied nests are observed during surveys, a vegetation buffer area no less than 100 feet in diameter will be maintained around the nest until all eggs have hatched and the young have fledged. Raptor nesting occurs in late winter through early spring and the TPWD recommends construction activities be excluded from a minimum

zone of 100 meters (approximately 328 feet) surrounding any raptor nest during the period of February 1 through July 15. State and federal regulations do not permit incidental take.

- Consistent with Texas Parks and Wildlife Code Chapters 65, 67, and 68, to protect the state listed threatened Texas Horned Lizard from direct and indirect harm, a permitted biological monitor should be present during construction to relocate lizards as needed, but if monitoring is not feasible, lizards observed within a construction site should be allowed to leave the site safely.

- Consistent with Texas Parks and Wildlife Code Chapters 65, 67, and 68, state listed threatened and endangered species may not be captured, trapped, taken, or killed and may be handled only by individuals with appropriate authorization from the TPWD Wildlife Conservation Permits Office. To ensure protection, construction contractors will implement the following or comparable measures:

    a) Prior to construction, the Authority should provide information to construction personnel regarding the potential occurrence of state listed species and Species of Greatest Conservation Need within the project area, as well as the relevant rules and regulations that protect plants, fish, and wildlife.
    b) Open excavations areas should be covered overnight and inspected every morning to ensure no wildlife species have been trapped, and excavation areas left open for more than two daylight hours should be inspected for the presence of trapped wildlife prior to backfilling. During construction, vehicular traffic should observe slow speeds (25 miles per hour, or less) within the project area to facilitate observation and avoidance of wildlife.
    c) For soil stabilization and revegetation of disturbed areas within the proposed project area, no-till drilling, hydromulching, or hydroseeding should be used rather than erosion control blankets or mats due to reduced risk to wildlife that may become entangled. If erosion control blankets or mats are used, the product should contain no netting or contain loosely woven, natural fiber netting in which the mesh design allows the threads to move, therefore allowing expansion of the mesh openings. Plastic mesh matting and hydromulch containing microplastics should be avoided.
    d) Removal of native vegetation during construction should be minimized to the extent feasible. Unavoidable removal of vegetation should be mitigated by revegetating disturbed areas with site specific plant species where feasible.

<u>Standard Environmental Conditions</u>

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

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

Therefore, the TWDB has issued this Finding of No Significant Impact consistent with the requirements of 31 TAC § 371.44.

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 environmental 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: 2026.06.18 14:12:51
-05'00'

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

Enclosures

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

Greenbelt Municipal and Industrial Water Authority,
Clarendon, Donley County
Drinking Water State Revolving Fund Project No. 62935
Develop Additional Water Supplies from the Ogallala Aquifer Project
Environmental Assessment

REVIEW PROCESS

As described below, the Texas Water Development Board (TWDB) has performed a review consistent with the 31 Texas Administrative Code (TAC) § 371.41 and the National Environmental Policy Act (NEPA), 42 U.S. Code § 4321 *et seq.* Consistent with 31 TAC § 371.45, the Greenbelt Municipal and Industrial Water Authority (Authority) prepared an Environmental Information Document (EID)[1] for the Develop Additional Water Supplies From the Ogallala Aquifer Project, which was reviewed by TWDB for the development of this Environmental Assessment (EA). This project is financed through the Drinking Water State Revolving Fund (DWSRF) program, which is administered by the TWDB.

PURPOSE AND NEED

The Authority obtains and treats raw water from three sources under its control, all of which are located in Donley County near Clarendon: surface water from Greenbelt Reservoir; and groundwater from the Clarendon and Kelley Creek well fields. The groundwater is pumped from the Ogallala Aquifer. Ongoing regional drought has reduced inflow into the reservoir, currently only 6.5 percent full (June 1, 2026). As a result of declining reservoir storage, the Authority lacks redundancy in its water supply, and should this trend worsen, the available water may prove inadequate to meet demand.

PROJECT DESCRIPTION

To address a potential shortfall in its water supply, the Authority proposed further groundwater development by acquiring additional water rights and designing and building supplemental well, transmission, and treatment facilities sufficient to meet current and future demands. Establishing the additional wells required prior well testing. Five potential sites were considered, but test wells were drilled at only three of these locations. The well testing phase included construction of permanent roads to the proposed well sites, well drilling, and aquifer testing. Funding for these activities was provided by the TWDB through the present loans during the initial part of the planning phase of this project. The Authority used some of the planning funds to assess the

[1]Greenbelt Municipal and Industrial Water Authority (May, 2026). Environmental Information Document (EID) (TWDB Form 0801). Prepared by Freese and Nichols, Inc., Fort Worth, Texas. Received by TWDB on May 11, 2026, but was incomplete. The EID was completed with the supplementary materials submitted to the TWDB on May 28, 2026.

potential environmental impact of these activities, for which the TWDB issued a Categorical Exclusion on November 26, 2026.

The current part of the planning phase concerns the project components addressed in this EA:

- completion of three groundwater wells at the test-well sites
- construction of a 16-inch diameter raw-water transmission pipeline approximately 12 miles in length
- installation of pipeline connections at the existing Authority's existing water treatment plant
- construction of a caustic storage and dosing system at the treatment plant to accommodate the new water source.

PROJECT FUNDING

To address these issues, the Authority applied to the TWDB for financing through the DWSRF program for planning, design, and construction, as well as to acquire land and easements. On April 6, 2023, the TWDB committed $18,110,000 for the project. The Authority closed the financing on August 23, 2023. Some of the planning funds were used to assess the potential environmental impact of the project and prepare an 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

The Authority evaluated a series of project alternatives in terms of their ability to address the demonstrated need, potential to cause direct, secondary, and cumulative impacts on the existing environment, financial cost, construction time, and other design criteria. On this basis, the Preferred Alternative was selected. In addition to the Preferred and No-Action alternatives, the Authority evaluated five others.

No-Action Alternative

The No-Action Alternative would have less impact than the Preferred Alternative; however, the Authority would continue to be dependent on its existing water supplies, which are proving inadequate. The No-Action Alternative would not alter the direct and indirect effects on the human environment and protected natural resources of current operations, but the quality of life of the residents of the Authority's service area would be affected negatively. Improving the quality of life of these residents is among the cumulative effects of the preferred alternative.

Other Alternatives Not Selected

Alternative Not Selected 1 (ANS1): Groundwater from the Ogallala Aquifer in northern Donley County would be transmitted to the Greenbelt Reservoir within the channel of Carrol Creek, a tributary stream flowing into the reservoir. The location for discharging this water was a site six

miles upstream from the reservoir but could be adjusted based on stream characteristics. Groundwater would flow under gravity from the well field to the discharge point. The water would then be withdrawn from Greenbelt Reservoir and treated at the Authority's existing water treatment facility. This strategy would result in the loss of approximately five percent of the discharged groundwater due to infiltration and evaporation during transport in the stream. In addition, a bed and banks permit from the Texas Commission on Environmental Quality would be needed for use of Carrol Creek and Greenbelt Reservoir for transport and storage of the water, as would an accounting plan to document withdrawals from Greenbelt Reservoir by source.

Alternative Not Selected 2 (ANS2): Groundwater from the Ogallala Aquifer would be transmitted from wells east of Clarendon to the Authority's existing water treatment facility. The groundwater would be transported approximately 6.5 miles through a new 16-inch diameter pipeline, requiring installation of a new 120-horsepower pump station. ANS 2 would require a larger well-field than that of the Preferred Alternative, and although the Preferred Alternative would require a longer raw-water transmission pipeline, more of that alignment would fall within existing rights of way and easements than would that of ANS2. In addition, construction of ANS2 would have greater adverse impact on important agricultural soils.

Alternative Not Selected 3 (ANS3): Shallow groundwater and pooled surface water would be transmitted from a gravel pit east of the Greenbelt Reservoir. The gravel operation contains large, excavated areas that fill with groundwater and spring flow. This water would be pumped from the gravel pit to the Authority's existing raw-water pipeline for transport to the water treatment plant. The quality of the water was suitable for use, but this source would provide at most 2.5 million gallons per day, which is less than that needed, and this strategy was proposed only as a temporary solution. To transmit the water, two miles of new 16-inch diameter pipeline and a new 120-horsepower pump station would have to be constructed. Because the gravel pit is a highly disturbed site, adverse environmental impact would be less than that occurring at other alternative locations.

Alternative Not Selected 4 (ANS4): Groundwater from the Ogallala Aquifer in northern Donley County would be transmitted to the Authority's existing treatment facility along a pipeline alignment partly overlapping that of ANS1. The alignment of ANS4 would cross ten streams, a high-voltage overhead electric transmission line and easement, public right-of-way, and private property. The permitting and easement requirements for ANS4 were expected to cause possible delays in the construction schedule.

Alternative Not Selected 5 (ANS5): Groundwater from the Ogallala Aquifer in northern Donley County would be transmitted directly into the Greenbelt Reservoir, crossing four streams, private property, and pastureland. The associated permitting and easements requirements and impact on agricultural land, vegetation, wildlife, and streams would exceed those of the Preferred Alternative.

All of the Alternatives Not Selected proved less advantageous and/or more impactful than the Preferred Alternative because of higher associated water losses, lower available water supply, added permitting requirements and landowner coordination, increased effects on existing infrastructure, elevated financial cost, longer construction time, greater environmental effects, etc.

Preferred Alternative

The Preferred Alternative is described above under the Project Description. The purpose of the Preferred Alternative is to provide a more reliable and sustainable water source for the Authority. The No-Action Alternative would not increase the available water supply, and relative to the financial costs, construction times, environmental and social impacts, and other variables, the Preferred Alternative presented a better means of addressing the Authority's needs than any of the Alternatives Not Selected.

ENVIRONMENTAL REVIEW

Consistent with the requirements of the federally funded DWSRF program, the Authority 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 for review and comment.

Potentially adverse effects on social and natural resources fall under the authority of various regulatory agencies. These agencies and participating area residents had the opportunity to address 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 Donley County, northwestern Texas, near the city of Clarendon, and would serve the entire population of the Authority's service area. Current and historical land use within the project area is primarily agricultural (rangeland and tilled cropland supported by irrigation in part) but with slowly increasing conversion to low-density suburban residential development and commercial/industrial activity. Greenbelt Reservoir, impounded in 1967, has been an important source of surface water and site for water related recreation.

Geology and Soils

The project area is located within the High Plains Physiographic Province in the Panhandle region of northwestern Texas. Upland terrain is flat to gently rolling but in most of the area, the High Plains plateau is heavily dissected by the Salt Fork Red River and its tributaries. Along the edge of the plateau, loosely consolidated calcareous siltstones of the Quaternary Blackwater Draw Formation (25 feet thick) overlie moderately to highly consolidated calcareous siltstones and sandstones of the Pliocene/Miocene Ogallala Formation (350 to 550 feet thick). The Ogallala Formation comprises the bulk of the Ogallala Aquifer. At the lowest elevations in the canyon of the Salt Fork Red River, sandstones, gypsum, and dolostones of the Permian Quartermaster Formation crop out or are covered by a veneer of Holocene alluvium (unconsolidated sand and silt).

The Authority's consultant coordinated with the Natural Resources Conservation Service and determined the project footprint includes areas of mapped soil units classified as Prime or Other Important Farmland as defined under the federal Farmland Protection Policy Act: Pullman clay, 0 to 1 percent slopes; Pep clay, 1 to 5 percent slopes; Acuff loam, 3 to 5 percent slopes, Miles fine sandy loam, 1 to 3 percent slopes and 3 to 5 percent slopes; Olton clay loam, 1 to 3 percent slopes; Altus fine sandy loam, dry, 0 to 1 percent slopes; and Guadalupe fine sandy loam, 0 to 2 percent slopes, occasionally flooded. The acreage permanently affected by well completion and related activities is too small to require mitigation measures. Following construction of the transmission pipeline and pipeline connections the presence of buried water lines will not interfere with the existing agricultural practices and does not constitute land use conversion. The storage and dosing installations will be located within the existing water treatment facility, which is already considered a converted site. Soil will not be moved off site and will not be contaminated as a result of the project.

Water Resources

The project area is located in the Arkansas-White-Red water resources region (United States Geological Survey Hydrologic Unit Code 11), specifically the Red River basin. The Authority has relied on surface water for part of its raw-water supply and on groundwater for the balance. The surface-water source is Greenbelt Reservoir, created in 1967 by impounding the Salt Fork Red River, a major tributary of the Red River. At present, the Authority also draws groundwater from two well fields pumping from the Ogallala Aquifer. Because storage within the reservoir has declined significantly owing to ongoing regional drought, the Authority plans to increase groundwater production by adding wells of approximately 550 to 720 feet depth. The additional groundwater will effectively replace the diminished availability of surface water and is intended to help offset a projected 1,565 acre-feet per year shortfall in supply. The Environmental Protection Agency does not designate the Ogallala as a sole source aquifer.

Runoff from most of the project area drains into Carrol Creek, a generally southward flowing tributary of the Salt Fork Red River. South of the river, the land drains generally northwestward into unnamed tributaries of the Salt Fork entering Greenbelt Reservoir. Impairment of surface-water quality from runoff during construction is expected to be temporary and negligible. A National Pollutant Discharge Elimination System permit will be acquired and a Stormwater Pollution Prevention Plan will be implemented by the contractor with erosion control best management practices in place prior to construction. The BMPs will minimize erosion, sedimentation, and pollution of surface waters, as well as airborne dust. Following construction, surface water will be essentially unaffected by the project except in terms of reducing the Authority' reliance on this source.

Topography and Floodplains

Elevation across the project area ranges from approximately 2,595 to 3,207 feet above mean sea level. Topography of the project area is primarily flat to moderately sloping, but there are steep slopes along the edge of the High Plains surface. Most of the area is dissected by ephemeral streams reaching the Salt Fork Red River or Greenbelt Reservoir and includes the geomorphically defined floodways and floodplains of Carroll Creek, other unnamed streams, and the river. The small community of Howardwick north of Greenbelt Reservoir participates in the National Flood Insurance Program (NFIP), whereas unincorporated areas in Donley County

do not. Part of Howardwick's incorporated area overlaps the Authority's project area. The Federal Emergency Management Agency (FEMA) mapped the Special Flood Hazard Area (100-year floodplain) within Howardwick but not in other parts of the project area. There are no mapped floodplains in that part of Howardwick within the project area.

Projects funded through the DWSRF program must, to the extent possible, avoid adverse impacts affecting the 100-year floodplain (Executive Order 11988 as amended by EO 13690). For communities and counties participating in the NFIP, construction in the floodplain requires prior issuance of a floodplain development permit. Non-participating polities are unable to issue such permits but may address avoidance of floodplain impact by other means. Although none of the project area encompasses a FEMA mapped floodplain, impact avoidance remains the responsibility of DWSRF funding recipients. The Authority will avoid permanent impacts to floodplains and floodways by utilizing directional boring or comparable trenchless construction methods at the four principal stream crossings. Following construction, pipeline easements will be returned to pre-construction contours, resulting in no change in the flood elevation. Should the Authority require information regarding the extent of the 100-year floodplain in its project area, FEMA guidelines state the floodplain may be approximated using "best available data." In addition, FEMA and the TWDB provide a useful online tool for floodplain approximation based on "Base Level Engineering" data and procedures.

Wetlands, Streams, and Waters of the United States

The project area is within the HUC-11 Salt Fork Red River basin and includes a proposed pipeline crossing the river just downstream from the Greenbelt Reservoir dam. This pipeline would cross other, minor drainages as well. Project areas north of the river lie within the watershed of Carroll Creek, an ephemeral stream, whereas runoff from the small area south of the river flows into small unnamed ephemeral streams. All surface-water drainage from the project area reaches the Reservoir or the un-impounded reach of the Salt Fork Red River downstream.

The National Wetlands Inventory (NWI) identified numerous wetlands and riverine and other aquatic habitats within and near the project area, primarily small, isolated, palustrine wetlands but including the Greenbelt Reservoir and a reach of the Salt Fork Red River a short distance east of the area. The Authority's consultant prepared a detailed aquatic resources delineation report (dated December 23, 2025, included in the EID) to assess wetlands and other water bodies within the project area that might constitute Waters of the United States (WOTUS) as defined under the Clean Water Act. The pipeline alignment crosses one NWI wetland, but the delineation study found no evidence of hydric soils or hydrophytic vegetation at that location. The consultant concluded the Salt Fork Red River might qualify as a WOTUS but found no other potentially jurisdictional waters in the area; however, the Authority did not obtain a formal jurisdictional determination from the United States Army Corps of Engineers, which has regulatory authority regarding WOTUS. Instead, the Authority will avoid potential impacts on streams during pipeline construction by means of directional boring, and no other construction is expected to have adverse effects.

In light of recent administrative and judicial decisions, there is uncertainty regarding the status of many aquatic habitats as potential WOTUS. Nonetheless, it appears likely the reach of the Salt Fork Red River within the project area would meet the current definition of WOTUS: although

flow is intermittent and frequently dry at present it probably was “essentially permanent” (intermittent, but frequently flowing) prior to construction of the Greenbelt Reservoir dam, which impounded the river’s flow in this area. None of the other streams would qualify. To avoid possible effects on streams, the Authority will utilize construction methods consistent with Nationwide Permit 58 for Utility Line Activities for Water and Other Substances at all significant stream crossings.

Biological Elements

Most of the project area is located within the Red Prairie of the Central Great Plains Ecological Region and the Canadian/Cimarron Breaks of the Southwestern Tablelands region as defined by the Environmental Protection Agency. The Authority’s consultant coordinated with the U.S. Fish and Wildlife Service and Texas Parks and Wildlife Department regarding the biological assessment of construction related impact in the project area. Databases of sensitive species were reviewed to determine whether any state and/or federally listed threatened, endangered, or otherwise protected species occur, or have occurred historically, within the project area and Donley County.

Three species listed for protection under the federal Endangered Species Act may occur in the project area: Piping Plover (*Charadrius melodus*, threatened); Rufa Red Knot (*Calidris canutus rufa*, threatened); and Monarch Butterfly (*Danaus plexippus*, proposed threatened). There are no designated critical habitats for these species in the area. Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act and both species may occur in the project area. In addition to the Bald and Golden Eagle, several additional species designated as Bird of Conservation Concern may be found there as well: Chestnut-collared Longspur (*Calcarius ornatus*); Chimney Swift (*Chaetura pelagica*); Lark Bunting (*Calamospiza melanocorys*); Least Tern (*Sternula antillarum antillarum*); Lesser Yellowlegs (*Tringa flavipes*); Pectoral Sandpiper (*Calidris melanotos*); Red-headed Woodpecker (*Melanerpes erythrocephalus*); Western Grebe (*Aechmophorus occidentalis*); and Willet (*Tringa semipalmata*). Seven state listed threatened or endangered species protected under 31 TAC 65.175, 65.176, and 69.8 occur or have occurred in Donley County and may be found in the project area at least seasonally, occasionally, or historically: Red River pupfish (threatened, *Cyprinodon rubrofluviatilis*); Texas Horned Lizard (threatened, *Phrynosoma cornutum*); Black Rail (threatened, *Laterallus jamaicensis*); Lesser Prairie-chicken (endangered, *Tympanuchus pallidicinctus*); White-faced Ibis (threatened, *Plegadis chihi*); Whooping Crane (endangered, *Grus americana*); and Palo Duro Mouse (threatened, *Peromyscus truei Comanche*).

The Authority’s consultant assessed the threat posed by construction to these species and others protected under the Migratory Bird Treaty Act or designated as Species of Greatest Conservation Need in Texas. The project area does not encompass habitats suitable for some of the species, whereas local occurrence of a few others is likely historic or only incidental during migration. Measures to protect species potentially affected by the project were defined by the regulatory agencies and will be implemented during construction.

No state or national parks, forests, grasslands, wildlife refuges, wild or scenic rivers, natural areas, or similar preserves are located within or near the project area and none would be affected by construction or other project related activities.

Cultural Resources

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

A cultural resources survey was performed under Texas Antiquities Permit Number 31531. The survey report (included in the EID) stated that no cultural materials were discovered on the ground surface or in shovel tests during the intensive pedestrian survey of the expanded well sites and proposed raw-water pipeline route. The well sites were in disturbed upland areas with limited potential for site preservation. Most of the pipeline alignment was previously disturbed by farming, ranching, and other activities, or was subject to erosion from seasonal flooding, which may account for the lack of historic sites. In addition to these factors, the absence of prehistoric archeological sites may be attributed to avoidance or minimization of localities with high probability of site burial, such as alluvial terraces along streams and the Salt Fork Red River. The report recommended no further cultural resource investigations.

Hazardous Materials

The TWDB does not fund testing, remediation, removal, disposal, or related work for contaminated or potentially contaminated materials, but the presence of such hazardous materials may affect the intended land use and thus the viability of the funded project. The Authority's consultant did not conduct a Phase I Environmental Site Assessment at the well sites or elsewhere but did perform a public records review of areas within the search distances recommended by the American Society for Testing and Materials.

There are no Superfund Sites identified in the EPA National Priorities List located in the proposed project areas. The records search disclosed the presence of two petroleum storage tanks, one active petroleum production well, numerous active and inactive water wells, and one inactive landfill in proximity. No construction would occur at these locations and conditions there would not affect the project.

Socioeconomics

The Authority is a wholesale water provider serving 21,422 residents in four counties. On November 22, 2024, the Authority's consultant generated an EJScreen Community Report of socioeconomic conditions for all properties within a 0.5-mile radius around the project area, using data from the United States Census for the period 2018 to 2022. Data include the population, percentage of minority residents, percent low income, and per capita income for the project area, and other information for comparison with data for the county and state.

Area	Population	Percent Minority	Percent Below Poverty Level	Per Capita Income
State of Texas	30,503,301	60.7	13.7	$37,514
Donley County	3,214	21.2	17.9	$25,682
Census Tract 9503	1,420	20.5	8.9	$34,838
Project area and 0.5-mile buffer	73	10	(34 percent low-income)	$31,599

The socioeconomic analysis indicates that as a percentage of the total population, racial/ethnic minorities in the project area and surroundings within 0.5 mile compose less than the corresponding percentages in the entire county or state. Local per capita income is greater than that in Donley County as a whole, but only 84.2 percent of the statewide average. The percentage of the area's population with incomes less than or equal to the state's official poverty level cannot be determined with available data but 34 percent of the population has low income, which is a much higher percentage than the comparable figures for the county or state.

Financial analysis of the project at the time of the TWDB's funding commitment projected repayment of the loan component based on system revenue alone, with no increase in monthly service rates or taxes to finance the debt. No residences or businesses will be relocated as a result of the project and eminent domain will not be required. The project will address the demonstrated need for additional water supplies and the entire population of the project and service areas will benefit from the proposed improvements. Therefore, although the local poverty rate is high, the project will not have a disproportionate adverse effect on minority or low-income populations.

Secondary and Cumulative Impacts

The project area encompasses part of a small community and low-density rural population in a region with limited ongoing economic development. No major infrastructure improvements are anticipated in the near term other than the activities associated with the current project, while the project itself is not expected to change the type, rate, or density of development in the project area and vicinity. Following construction, the predominant land uses will remain agricultural and suburban to rural residential. Therefore, secondary and cumulative impacts on the human environment and natural resources will not significantly exceed the temporary effects of the project alone.

Environmental effects of construction would be confined to the well sites, existing water treatment facility, and transmission pipeline corridor. These effects would be temporary and comparable to those resulting from system maintenance. Air quality may be reduced in the immediate vicinity of operating excavators and vegetation will be disturbed within the utility easements; however, the pipeline corridor is mowed and maintained at present. Conditions will return to their existing state once construction activities are completed.

AGENCY COORDINATION AND COMPLIANCE

To ensure due consideration of the project's potential environmental impact, the Authority's consultant prepared an EID describing the results of that assessment, 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 Authority 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 § 371.41, to ensure compliance with DWSRF 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, as amended by Executive Order 12148
(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.*
(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 federal and state regulatory agencies, regional and local authorities, and other stakeholders and interested parties regarding the project's potential impact. The Authority contacted all parties, requesting input. Responses were not required from some, and not all parties responded. The respondents are listed below and the results of coordination are summarized in the EID and reflected in the environmental conditions.

- United States Army Corps of Engineers, Regulatory Branch, Tulsa District, in accordance with Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899
- United States Department of Agriculture, Natural Resources Conservation Service, in accordance with the Farmland Protection Policy Act

- United States Fish and Wildlife Service, Texas Coastal and Central Plains Ecological Services Field Office, in accordance with the Endangered Species Act, Migratory Bird Treaty Act, and other regulations affecting federally protected species
- Texas Commission on Environmental Quality, in accordance with 40 CFR Part 93, National Ambient Air Quality Standards, and 30 TAC § 101.30
- Texas General Land Office, in accordance with 31 TAC 13.17 and 13.21
- Texas Historical Commission, State Historic Preservation Officer, in accordance with Section 106 of the National Historic Preservation Act, Antiquities Code of Texas, and other applicable regulations
- Texas Parks and Wildlife Department, Wildlife Division, Ecological and Environmental Planning Program, in accordance with the Endangered Species Act of 1973, as amended; Migratory Bird Treaty Act; Texas Parks and Wildlife Code; and other applicable regulations
- Panhandle Regional Planning Commission

The following agencies/parties did not respond:

- Bureau of Reclamation, Oklahoma-Texas Area Office
- Bureau of Land Management
- City of Clarendon
- City of Howardwick

United States Army Corps of Engineers

The Authority's consultant prepared and submitted an Aquatic Resources Delineation Report and request for a pre-application meeting to the United States Army Corps of Engineers (USACE). The consultant reported the presence of one intermittent stream (Salt Fork Red River) and three ephemeral streams but no wetlands and concluded the only potential WOTUS was the river. As denoted by the consultant, impact to the river and ephemeral streams would be avoided by utilizing trenchless construction methods for installation of the raw-water transmission pipeline. No other project elements were expected to affect aquatic resources under the USACE's jurisdiction.

The USACE reviewed the information and designated the project USACE Project Number SWT-2026-00166. In a letter dated April 8, 2026, the USACE stated that continued coordination would be needed only if jurisdictional waters would be affected, presumably because of a change in the construction footprint, which is not expected.

United States Department of Agriculture, Natural Resource Conservation Service

The Authority's consultant assessed the project's potential impact on Prime and Important Farmland and submitted the required Farmland Conversion Impact Rating form (AD1006) and associated maps to the Natural Resource Conservation Service (NRCS). The project area encompasses several areas with significant agricultural soils that would be affected by construction, On April 10, 2026, the NRCS stated that because of the well field's low rating (primarily because of the limited area of affected agriculturally important soils), "no further consideration for protection and no additional evaluation is necessary." Construction of the

transmission pipeline is not considered “a permanent conversion of farmland” and is therefore exempt from regulation.

United States Fish and Wildlife Service

Concerning the project’s potential effect on federally listed threatened or endangered species, the Authority’s consultant submitted a “No Effect” determination for the threatened Piping Plover and Rufa Red Knot using the Texas Statewide Determination Key through the Information for Planning and Consultation system. On April 2, 2026, the United States Fish and Wildlife Service (USFWS) assigned Project Code No. 2026-0027775 to the project and issued a concurrence letter stating that “No further consultation/coordination for this project is required for these species.” The proposed threatened Monarch Butterfly may be present in the area and could be affected, but mitigation measures to be implemented during construction should reduce the risk. No other adverse effects on federally listed threatened or endangered species were anticipated. The USFWS stated that because the impact assessment indicated the project was unlikely to disturb nesting Bald Eagles, application for a take permit was not necessary at that time. In addition, the project will limit seasonal vegetation clearing to avoid effects on all nesting migratory birds.

Texas Commission on Environmental Quality

Following standard procedures, the TWDB submitted a request for determination of the project’s effects on air quality to the Texas Commission on Environmental Quality (TCEQ). On March 27, 2023, the TCEQ responding, stating that air quality in Donley County is classified as “attainment/unclassifiable for the National Ambient Air Quality Standards for all six criteria air pollutants” and “Federal Clean Air Act, § 176(c) general conformity requirements do not apply for this action [i.e., project related construction].”

Texas General Land Office

The Authority’s consultant reviewed the General Land Office’s (GLO’s) online Land and Lease Viewer to determine whether the channel of the Salt Fork Red River is a state-owned streambed, then initiated coordination with the GLO. On May 7, 2026, the GLO stated it “has no jurisdiction to [issue] easements at this time” for the pipeline crossing as proposed.

Texas Historical Commission/State Historic Preservation Officer

The Authority’s consultant reviewed the Texas Historical Commission’s Archeological Sites Atlas to assess the project’s potential impact on historic and cultural resources, then initiated project coordination with the State Historic Preservation Officer (SHPO). The SHPO determined that a cultural resource survey of the project area would be required. The Authority’s consultant conducted the survey (Texas Antiquities Permit No. 31531) and submitted a report of findings. The staff of the Texas Historical Commission (THC) reviewed the report and concurred with the finding that no direct impacts to cultural resources/historic properties were anticipated as a result of the project, but if historic properties or cultural materials were encountered during construction, work in that area should cease and the THC should be contacted (THC Tracking No. 202604688).

Texas Parks and Wildlife Department

The Authority's consultant reviewed the Texas Parks and Wildlife Department's (TWDB's) Texas Natural Diversity Database and the Rare, Threatened, and Endangered Species List for Donley County (updated January 15, 2025) to assess the possible presence in the project area of federal or state listed threatened or endangered species or state listed rare species or Species of Greatest Conservation Need (SGCN). The consultant then submitted the resulting information and a report based on a pedestrian survey of the project area by qualified biologists to the TWDB. Listed species are present and some could be affected by project related construction.

On April 8, 2026, the TPWD responded, assigning the project TPWD Project Number 58767 and providing a series of recommendations to ensure protection of wildlife, vegetation, and their habitats.

1) To avoid effects (including incidental take) on protected migratory birds, vegetation clearing should be avoided during the general bird nesting season, March 15 through September 15. If clearing during the nesting season is unavoidable, affected areas should be surveyed for the presence of nests with eggs or young; and should nests be found, the Authority should maintain a 100-foot wide buffer of vegetation around active nests until the eggs have hatched and the young have fledged.
2) State listed threatened and endangered species may not be captured, trapped, taken, or killed and may be handled only "by individuals with appropriate authorization from the TPWD Wildlife Conservation Permits Office."
3) To protect the state listed threatened Texas Horned Lizard, a permitted biological monitor should be present during construction to relocate lizards as needed, but if monitoring is not feasible, lizards observed within a construction site "should be allowed to safely leave the site."
4) Prior to construction, the Authority should provide information to construction personnel regarding the potential occurrence of state listed species and SGCN within the project area, and "the relevant rules and regulations that protect plants, fish, and wildlife." If protected species are encountered during construction, "measures should be taken to avoid impacting wildlife."
5) During construction, vehicular traffic should observe slow speeds (25 miles per hour, or less) within the project area to facilitate observation and avoidance of wildlife.
6) Open excavations areas should be covered overnight and inspected every morning to ensure no wildlife species have been trapped, and "Excavation areas left open for more than two daylight hours should be inspected for the presence of trapped wildlife prior to backfilling."
7) "[R]emoval of native vegetation during construction [should] be minimized to the extent feasible. Unavoidable removal of vegetation should be mitigated by revegetating disturbed areas with site specific plant species where feasible."
8) "For soil stabilization and revegetation of disturbed areas within the proposed project area…no-till drilling, hydromulching, or hydroseeding [should be used] rather than erosion control blankets or mats due to reduced risk to wildlife [that may become entangled]. If erosion control blankets or mats are used, the product should contain no netting or contain loosely woven, natural fiber netting in which the mesh design allows the threads to move, therefore allowing expansion of the mesh openings. Plastic mesh matting and hydromulch containing microplastics should be avoided."

PUBLIC PARTICIPATION

The project is consistent with local, regional, state, and national planning guidelines, statutes, and ordinances. Coordination with the appropriate governmental agencies has been undertaken and no adverse comments have been received.

Public participation conducted during facilities planning included a public meeting held on April 7, 2026, which was advertised in the Clarendon Enterprise, a newspaper of general circulation in the service area. The notice was published on March 5, 12, 19, and 26, 2026, and contained information regarding availability of planning documents, including the EID, for public review at the Authority's water treatment plant at 4610 State Highway 70, Clarendon, Texas during normal business hours (8:00 a.m. to 5:00 p.m.).

The public meeting was held at 5:00 p.m. on April 7, 2026, at the Authority's water treatment plant. A total of 42 people attended the meeting, most of whom were members of the public and not part of the project team. Oral questioning concerned a range of project related topics, all of which were addressed. Five persons provided written responses: three requested copies of the meeting notes, one asked for a copy of the meeting summary, and another for a copy of the project schedule. All requests were fulfilled. No other concerns or adverse comments were voiced at the public meeting or received during the previous 30-day public review period.

ENVIRONMENTAL CONDITIONS

An environmental review of the project consistent with NEPA has been completed following the guidelines provided in 31 TAC § 371.45. 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 Authority, the proposed Develop Additional Water Supplies From the Ogallala Aquifer Project is considered environmentally sound with the following special and standard environmental conditions.

Special Environmental Conditions

- Consistent with Section 404 of the Clean Water Act, the proposed project will avoid impacts to potential Waters of the United States, including wetlands. The raw-water transmission pipeline will be installed by means of horizontal boring or comparable trenchless construction methods at all significant stream crossings, specifically the Salt Fork Red River, Caroll Creek, and two other, unnamed streams located north of the river, with bore pits located outside the Ordinary High Water Mark in compliance with the terms and conditions of United States Army Corps of Engineers Nationwide Permit 58 for Utility Line Activities for Water and Other Substances (USACE No. SWT-2026-00166). A Stormwater Pollution Prevention Plan (SWPPP) will be implemented by the contractor with best management practices (BMPs) in place prior to construction to minimize dust, sedimentation, erosion, and pollution to surface waters.

- Consistent with Executive Order (EO) 11988 as amended by EO 13690, and Texas Water Code Section 16.315, the Greenbelt Municipal and Industrial Water Authority (Authority) must, to the extent possible, avoid adverse impacts affecting the 100-year

floodplain. Although none of the project area encompasses a FEMA mapped floodplain, impact avoidance remains the responsibility of DWSRF funding recipients. The Authority will avoid permanent impacts to floodplains and floodways by utilizing directional boring or comparable trenchless methods for pipeline construction at the four principal stream crossings: Salt Fork Red River; Carroll Creek; and two unnamed tributaries north of the river. Following construction, pipeline easements will be returned to pre-construction contours, resulting in no change in the flood elevation. Should the Authority require information regarding the extent of the 100-year floodplain along a stream in its project area, Federal Emergency Management Agency (FEMA) guidelines state the floodplain may be approximated using “best available data.” In addition, FEMA and the TWDB provide a useful online tool for floodplain approximation based on “Base Level Engineering” data and procedures.

- Consistent with the Migratory Bird Treaty Act, Endangered Species Act of 1973, as amended, and Texas Parks and Wildlife Code Chapters 64, 65, 67, and 68, vegetation clearing must be excluded during the general bird nesting season, March 15 through September 15, to avoid adverse impacts to breeding birds. If vegetation clearing during this time is unavoidable, the area proposed for disturbance will be surveyed by a qualified biologist to identify occupied nests, not more than five days prior to clearing activities. If occupied nests are observed during surveys, a vegetation buffer area no less than 100 feet in diameter will be maintained around the nest until all eggs have hatched and the young have fledged. Raptor nesting occurs in late winter through early spring and the TPWD recommends construction activities be excluded from a minimum zone of 100 meters (approximately 328 feet) surrounding any raptor nest during the period of February 1 through July 15. State and federal regulations do not permit incidental take.

- Consistent with Texas Parks and Wildlife Code Chapters 65, 67, and 68, to protect the state listed threatened Texas Horned Lizard from direct and indirect harm, a permitted biological monitor should be present during construction to relocate lizards as needed, but if monitoring is not feasible, lizards observed within a construction site should be allowed to leave the site safely.

- Consistent with Texas Parks and Wildlife Code Chapters 65, 67, and 68, state listed threatened and endangered species may not be captured, trapped, taken, or killed and may be handled only by individuals with appropriate authorization from the TPWD Wildlife Conservation Permits Office. To ensure protection, construction contractors will implement the following or comparable measures:

  a) Prior to construction, the Authority should provide information to construction personnel regarding the potential occurrence of state listed species and Species of Greatest Conservation Need within the project area, as well as the relevant rules and regulations that protect plants, fish, and wildlife.
  b) Open excavations areas should be covered overnight and inspected every morning to ensure no wildlife species have been trapped, and excavation areas left open for more than two daylight hours should be inspected for the presence of trapped wildlife prior to backfilling. During construction, vehicular traffic should observe slow speeds

(25 miles per hour, or less) within the project area to facilitate observation and avoidance of wildlife.

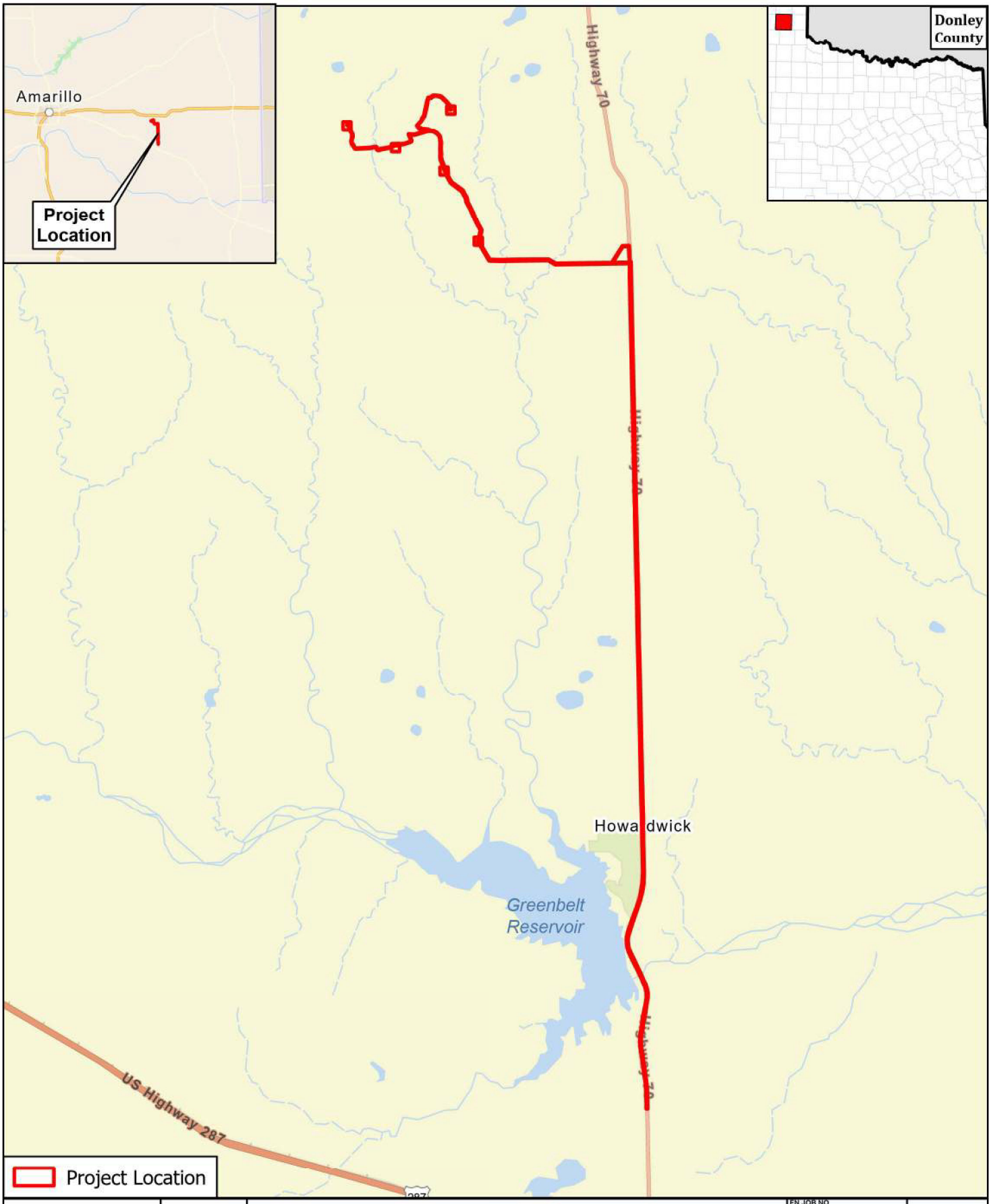
c) For soil stabilization and revegetation of disturbed areas within the proposed project area, no-till drilling, hydromulching, or hydroseeding should be used rather than erosion control blankets or mats due to reduced risk to wildlife that may become entangled. If erosion control blankets or mats are used, the product should contain no netting or contain loosely woven, natural fiber netting in which the mesh design allows the threads to move, therefore allowing expansion of the mesh openings. Plastic mesh matting and hydromulch containing microplastics should be avoided.
d) Removal of native vegetation during construction should be minimized to the extent feasible. Unavoidable removal of vegetation should be mitigated by revegetating disturbed areas with site specific plant species where feasible.

Standard Environmental Conditions

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

- Consistent with the TWDB Supplemental Construction Contract Conditions (TWDB-0550), the 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.



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

N W E S

GREENBELT MUNICIPAL AND INDUSTRIAL

North Well Field and Water Line

Regional Location Map

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Feet

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A-1

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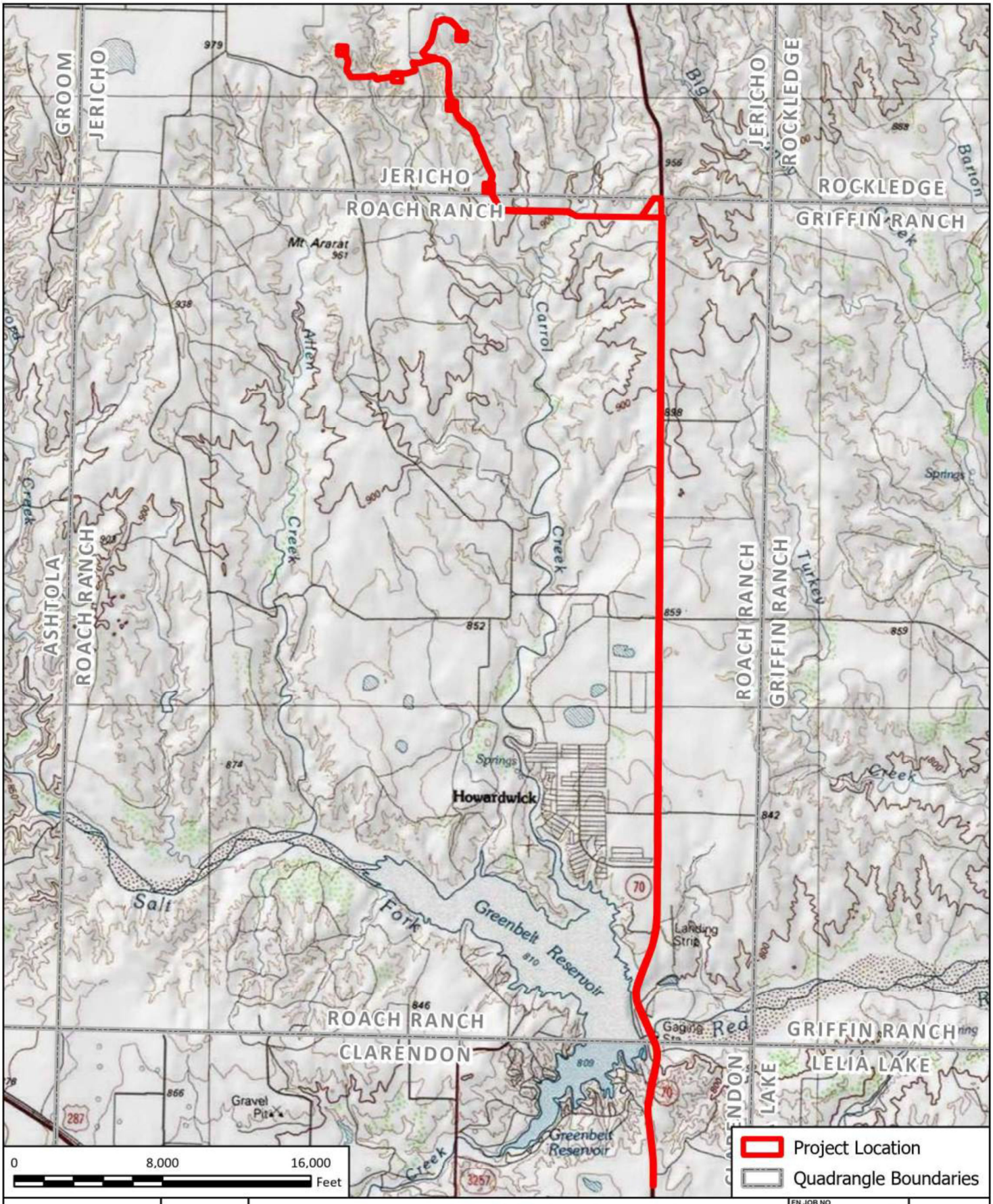

FREESE AND NICHOLS
FREESE AND NICHOLS, INC
801 Cherry Street, Suite 2800
Fort Worth, TX 76102
Phone - (817) 735 - 7300

N W E S

GREENBELT MUNICIPAL AND INDUSTRIAL

North Well Field and Water Line

USGS Topographic Map
USGS 7.5 Minute Quadrangle: Roach Ranch, Clarendon, Jericho

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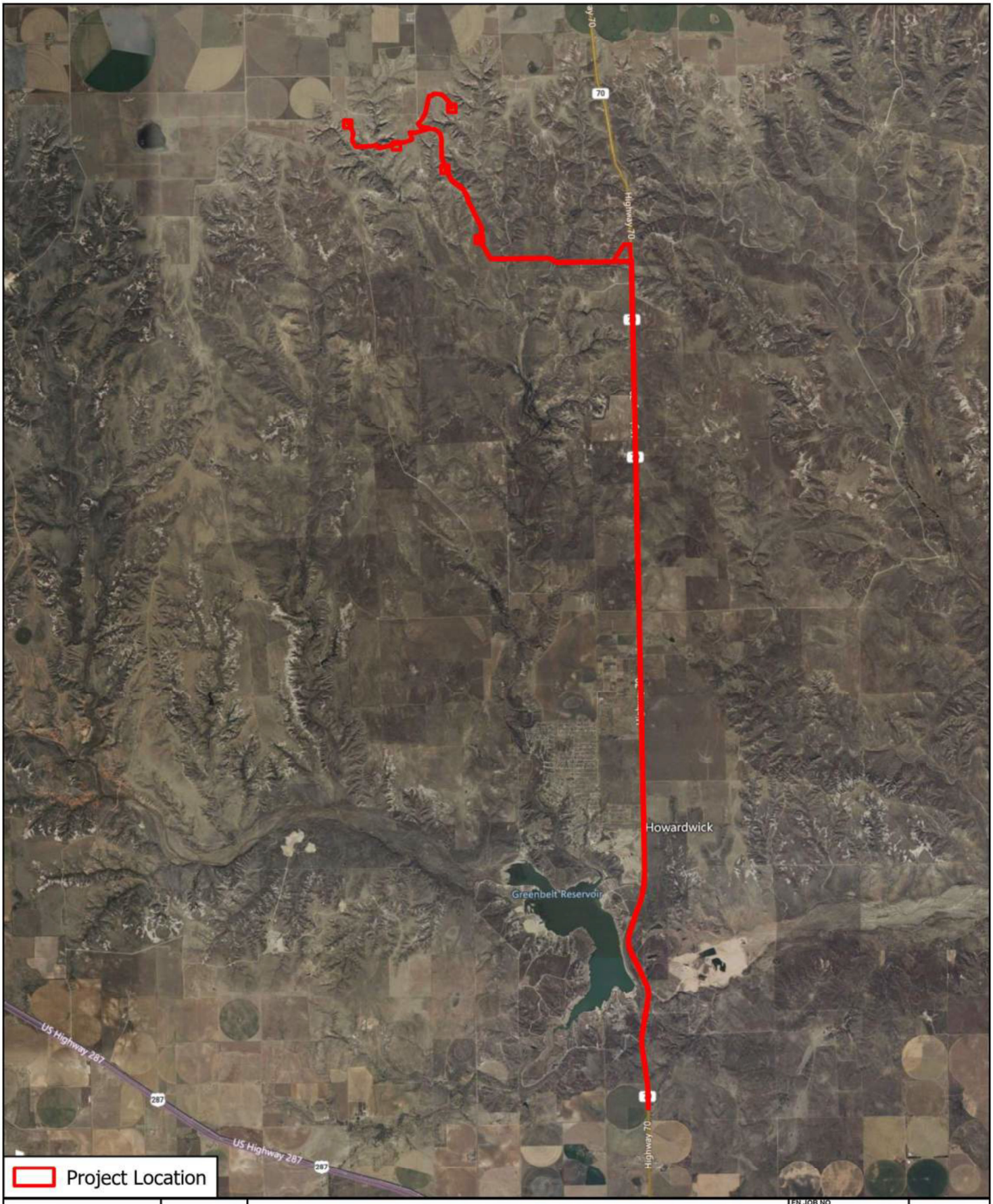

FREESE AND NICHOLS
801 Cherry St, Suite 2800
Fort Worth, TX 76102
Phone - (817) 735-7300

N W E S

GREENBELT MUNICIPAL AND INDUSTRIAL
North Well Field and Water Line

Project Footprint Map

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Feet

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FIGURE

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