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CATEGORICAL EXCLUSION

TO ALL INTERESTED AGENCIES AND PUBLIC GROUPS:

As provided by the environmental review process adopted in the rules of the Texas Water Development Board (TWDB), 31 Texas Administrative Code (TAC) § 371.41, for projects to be funded through the Drinking Water State Revolving Fund (DWSRF) program and consistent with the National Environmental Policy Act, 42 United States Code § 4321, *et seq.*, the TWDB has determined that the proposed action identified below may be exempted from comprehensive environmental review:

City of Gordon, Palo Pinto County, Texas
TWDB DWSRF Project No. 62951
Water Treatment and Distribution Improvements
Total Financing Amount: \$2,135,784
Loan No. LF1001849, L1001848

The City of Gordon (City) is proposing to use \$2,135,784 in financing from the DWSRF program for the Water Treatment and Distribution Improvements project to address aging facilities at the Gordon Water Treatment Plant (WTP), chlorine residuals within the distribution system, undersized distribution pipelines, and low pressures in the west portion of the system that resulted in an enforcement action by the Texas Commission on Environmental Quality (Docket No. 2021-1542-PWS-E) and a corresponding compliance agreement.

The City is planning to implement the following improvements at four locations:

- Gordon WTP, located outside of the City's limits in unincorporated Palo Pinto County at 1801 State Highway (SH) 193
 - Replace clarifier with new plate settlers
 - Ancillary site improvements to plumbing, electrical, and SCADA systems
- Farm-to-Market (FM) 919, in the Gordon City Limits, located north of Interstate Highway (IH) 20 in both Palo Pinto and Erath Counties
 - Replace approximately 3,200 linear feet (LF) of existing 4-inch line with 8-inch pipeline
 - Replace existing valves, repair pavement, associated appurtenances

Our Mission

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

Board Members

L'Oreal Stepney, P.E., Chairwoman | W. Brady Franks, Board Member | Ashley Morgan, Board Member
Bryan McMath, Executive Administrator

- Two IH-20 waterline crossings, located outside of the City's limits in unincorporated Erath County
 - Install an approximately 400-LF water line with 14-inch encasement by boring under the highway from the Thurber Pump Station on south side of freeway to existing line that feeds the west distribution system
 - Install an additional highway crossing of the same approximate length and diameter at the west end of the distribution system, approximately 0.6 miles west of the Thurber Pump Station and approximately 175 feet east of County Road 107
- Thurber Pump Station, located on the south side of the eastbound IH-20 service road, approximately 1,000 feet east of Private Road 1037 in Erath County
 - Pump upsizing and fill piping modifications
 - Replumbing ground storage tank to improve circulation

The proposed improvements to the City's WTP will occur within the existing treatment facility and rights of way with no extensions. No land or easement acquisition will be required. The existing distribution system waterlines will be replaced by new lines within approximately three feet wherever possible. In some cases, the depth of excavation may be greater than the existing pipe, and the location of the replacement pipe may not be immediately adjacent to the existing line (e.g., opposite side of street). The existing lines consisting of PVC or cast iron may be removed or abandoned in place, but existing lines composed of asbestos cement (AC) must be abandoned in place.

To ensure that there will be no adverse environmental impacts associated with the construction, the City coordinated with the Texas Historical Commission (THC) and Texas Parks and Wildlife Department (TPWD). In a letter dated August 18, 2025, the THC stated that the proposed project will not adversely affect protected cultural resources, including sites listed or eligible for listing on the National Registry of Historic Places, State Antiquities Landmarks, or archeological materials (THC Tracking No. 2025513067). The TPWD made recommendations to mitigate possible impacts to migratory and non-game bird species that have been incorporated into the special conditions of this environmental finding (TPWD Project No. 53580). On July 30, 2025, the TPWD indicated that coordination with the City is complete and no further habitat survey of the area is necessary.

The proposed project will not adversely impact waters of the United States, including wetlands. The proposed project is not located within a Special Flood Hazard Area; therefore, coordination with the local floodplain administrator was not required. In addition, the proposed project is not expected to impact threatened or endangered species or habitat.

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.

The staff of the TWDB recommended issuance of a Categorical Exclusion (CE) for this project. The decision to grant this CE is allowed because the specified project elements will not cause significant adverse impacts to cultural and natural resources. Documentation supporting this determination is on file at the TWDB.

This determination shall be revoked if it is found that

- (1) the project no longer meets the requirements for a categorical exclusion from full environmental review as a result of changes in the project;
- (2) the project involves extraordinary circumstances as described in 31 TAC § 371.42; or
- (3) the project may violate or has violated federal, state, local, or tribal laws.

The proposed project must comply with the following special and standard environmental conditions:

Special Environmental Conditions

- Consistent with the Endangered Species Act of 1973, as amended, the Migratory Bird Treaty Act, and the Texas Parks and Wildlife Code Chapter 64 (Texas Parks and Wildlife Department Project No. 53580), 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 of no less than 100 feet in diameter will remain around the nest until all young have fledged; however, the size of the buffer zone depends on various factors and can be coordinated with the local or regional USFWS office. State and federal regulations as currently interpreted do not permit incidental take.

Standard Environmental Conditions

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

Categorical Exclusion
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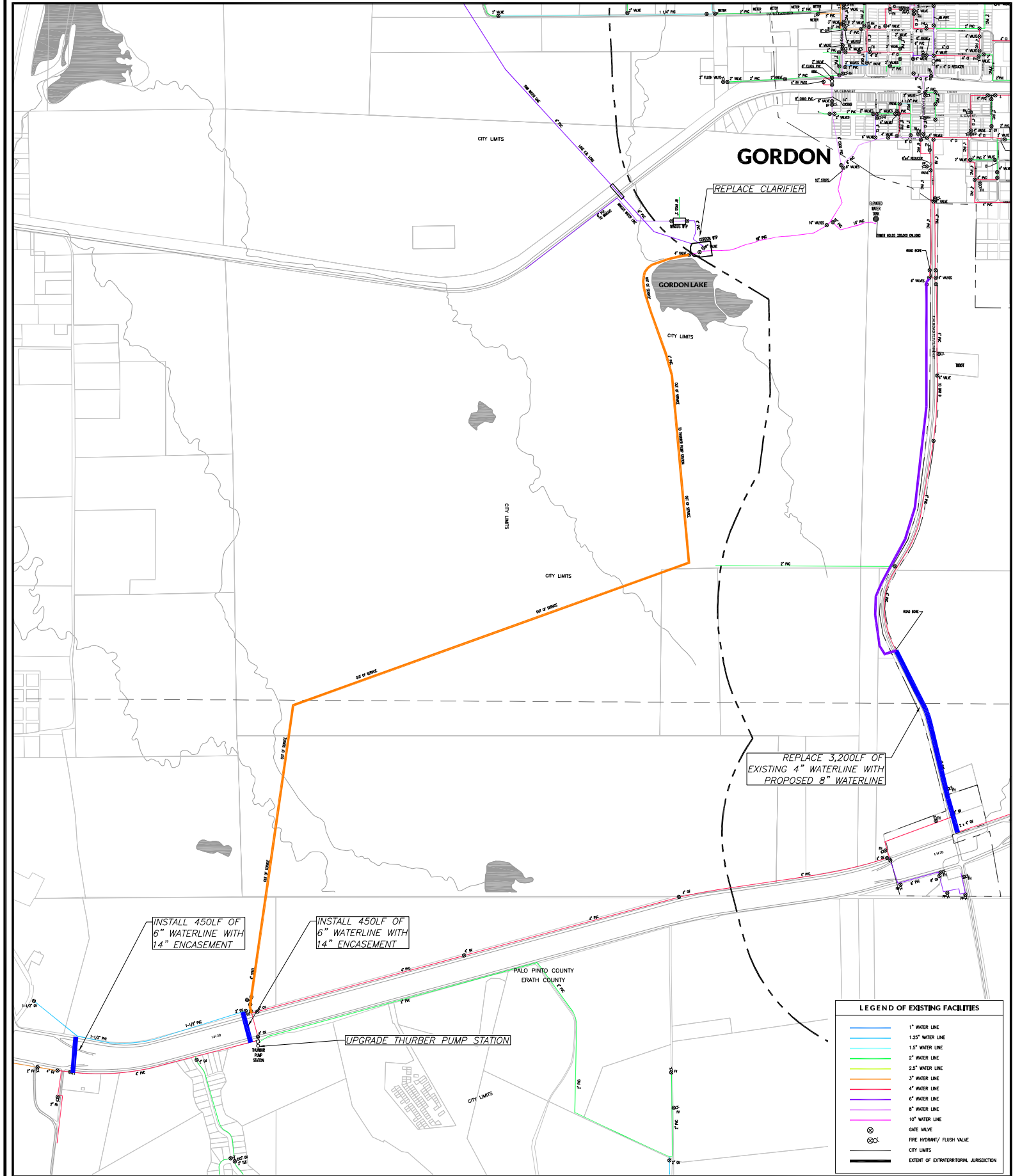
Comments regarding this determination may be submitted to the Director of Regional Water Project Development, Texas Water Development Board, P.O. Box 13231, Austin, Texas 78711-3231 or via email at RWPD-Environmental@twdb.texas.gov.

Sincerely,

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

Enclosures



CITY OF GORDON

PALO PINTO COUNTY, TEXAS

WATER SYSTEM SYSTEM IMPROVEMENTS

TWDB DWSRF 62951

