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Phone (512) 463-7847, Fax (512) 475-2053

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 requirements:

City of Waco, McLennan County, Texas
TWDB DWSRF Project No. 62993
Lead Service Line Replacement Program Project
Total Financing Amount: \$20,000,000
Commitment Nos. L1002123 and LF1002124

The City of Waco (City) is proposing to use \$20,000,000 in funding from the DWSRF Lead Service Line Replacement Program for the Lead Service Line Replacement Program project. The City has identified 400 galvanized water lines requiring replacement (GRR) and 445 “lead on block” water lines requiring replacement. The 400 GRR services were identified through a historical records review and a statistical review of the records by Baylor University. The lead on block categorization is a water line service that was on a block where a lead line was already identified and replaced, but the private side service line has the potential to be classified as a GRR after further investigation on the private property.

The proposed project will replace the 845 identified GRR and lead on block water service lines. Multiple construction methods may be used for the service line replacement if the open-cut construction method is not suitable for an individual property. However, the City expects to use the open-cut construction method for most of the service line replacements. If special circumstances are identified in the field, the City may investigate alternative construction methods, such as pipe bursting. The contractor will be required to remove and dispose of the old pipe and other such debris or rubbish generated by the project in an appropriate manner that is consistent with local, state, and federal regulation and applicable laws. The existing water service lines will be replaced with poly lines. The City plans to replace the water service lines within the same alignment, unless there are direct conflicts that require a slight adjustment. The proposed project does not include creek or wetlands crossings.

Existing water service lines will be replaced by new service lines in the same or proximate locations. The existing lines will be removed and dispose of the existing lines in accordance with local, state, and federal laws and regulations. Environmental impacts will be similar to pipeline

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replacement activities and limited to those associated with excavation and pipe installation. Water service lines will be installed in accordance with International Plumbing Code standards.

Proceeds of these commitments must not be used by the City when sampling, testing, removing, or disposing of contaminated soils or media at the project site, except for a lead service line replacement project or associated activity directly connected to the identification, planning, design, and replacement of lead service lines. The obligations must include an environmental indemnification provision wherein the City agrees, and will require its construction contractors, to indemnify, hold harmless, and protect the TWDB from any and all claims, causes of action, or damages arising from activities performed by the City or its construction contractors, including their officials and employees, in connection with the project, to the extent permitted by law.

To ensure that there will be no adverse environmental impacts associated with the construction, the City coordinated with the Texas Historical Commission (THC). In a letter dated October 14, 2025 (THC Tracking No. 202600497), the THC stated that there are known historic resources in the Area of Potential Effect for the proposed project. Therefore, a professional archeologist must be present during construction to monitor excavations in the areas from 6th Street and 10th Street going north to south and from Jefferson Street to Washington Street going west to east. If cultural materials are encountered, the monitor will stop construction in the immediate vicinity and examine the discovery. Construction may take place beyond a 50-foot buffer surrounding the discovery.

The proposed project will not adversely impact waters of the United States, including wetlands. The proposed project appears to be partially within a 100-year floodplain and regulatory floodway, as designated by the Federal Emergency Management Agency (FEMA). Projects involving construction in the 100-year floodplain and regulatory floodway, including replacement or borings, require a floodplain development permit from the local floodplain administrator prior to construction in the 100-year floodplain. The proposed project is not expected to impact threatened or endangered species or habitat.

The TWDB previously 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 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

- To ensure compliance with Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas, a professional archeologist must be present to monitor excavations in the areas between 6th Street and 10th Street going north to south and from Jefferson Street to Washington Street going west to east. If cultural materials are encountered, the monitor will stop construction in the immediate vicinity and examine the discovery. Construction may take place beyond a 50-foot buffer surrounding the discovery (THC Tracking No. 202600497).
- Consistent with the Flood Insurance Reform Act of 2004, federal Executive Order 11988 as amended by EO 13690, Texas Water Code Section 16.315, and local floodplain development ordinances, a floodplain development permit will be obtained from the local floodplain administrator prior to construction in, across, or under a Special Flood Hazard Area, and any requirements contained therein will be adhered to.

Standard Environmental Conditions

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

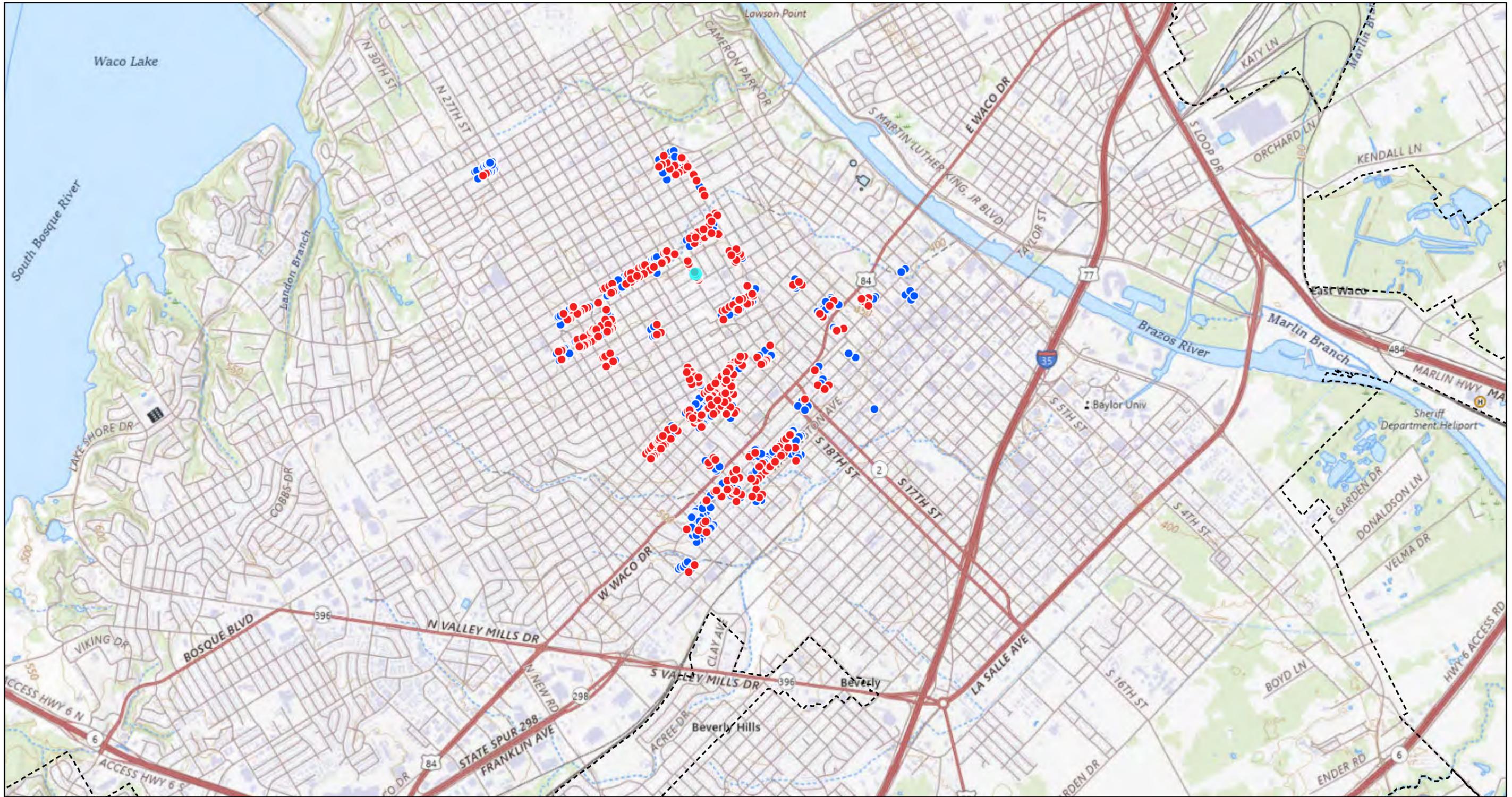
Comments regarding this determination may be submitted to the Director of Regional Water Project Development, Texas Water Development Board, P.O. Box 13231, Austin, Texas 78711-3231 or via email at RWPD-Environmental@twdb.texas.gov.

Sincerely,

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

Enclosures

Waco GRR and Lead on Block Connections



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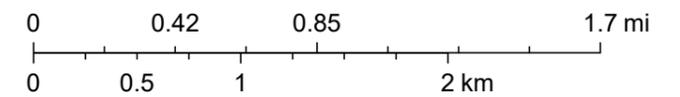
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- GRR
- Lead On Block

--- Waco City Limits

USGSTopo

- Red: Band_1
- Green: Band_2
- Blue: Band_3



USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS