



P.O. Box 13231, 1700 N. Congress Ave.
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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) § 375.61, 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 Clean Water State Revolving Fund (CWSRF) Equivalency Program, which is administered by the TWDB.

City of Moody, McLennan County, Texas
TWDB CWSRF Project No. 73935
New Wastewater Treatment Plant
Total Financing Amount: \$11,432,583
Loan Nos. L1001630, L1001631
Loan Forgiveness No. 1001632

The City of Moody (City) is proposing to use \$11,432,583 in financing from the CWSRF program for the New Wastewater Treatment Plant project to construct a new wastewater treatment plant (WWTP) on a 3-acre parcel north of the City's existing WWTP, which will be decommissioned and demolished.

An environmental review of the project consistent with NEPA has been completed following the guidelines provided in 31 TAC § 375.61. This environmental review is documented by the enclosed Environmental Assessment, which contains mitigative environmental conditions that will be applied to the project 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. Based on a detailed environmental review of the planning information, the Environmental Information Document, and other documentation, the project is environmentally sound with the following special and standard environmental conditions:

Special Environmental Conditions

- If the design of the proposed outfall changes and the outfall is relocated below the ordinary high water mark (OHWM) of the unnamed tributary to Stampede Creek, the City of Moody (City) will recoordinate with the United States Army Corps of Engineers (USACE) to apply for a Pre-Construction Notification (PCN) for a Nationwide Permit 18 for Minor Discharges.
- As per agreements with the Texas Parks and Wildlife Department (TPWD), Ecological & Environmental Planning Program (TPWD Project No. 56268) and United States Fish and Wildlife Service (USFWS Project Code 2026-0023591), to ensure compliance with

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Chapter 12, 64, and 67 of the Texas Parks and Wildlife Code, and the Endangered Species Act of 1973, as amended, the Migratory Bird Treaty Act, and applicable federal regulations pertaining to protected species, the following measures will be implemented:

- Vegetation clearing must be excluded during the general bird nesting season and tricolored bat (*Perimyotis subflavus*) pupping season, March 15 through September 15, to avoid adverse impacts to breeding birds and tricolored bats. If vegetation clearing during this time is unavoidable, the area proposed for disturbance will be surveyed by a qualified biologist to identify occupied nests and pupping habitat, not more than five days prior to clearing activities. If occupied nests or bat roosts or hibernacula are observed during surveys, a vegetation buffer area of no less than 100 feet in diameter will remain around the nest or roost 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.
- Vegetation clearing and/or construction will not occur within 660 feet in diameter of a bald eagle nest. If occupied nests are observed during at any time, a vegetation buffer area of no less than 660 feet in diameter will remain around the nest until all young have fledged.

Standard Environmental Conditions

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

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 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,

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

Enclosures



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**City of Moody, McLennan County
Clean Water State Revolving Fund Project No. 73953
New Wastewater Treatment Plant
Environmental Assessment**

REVIEW PROCESS

As described below, Texas Water Development Board (TWDB) has performed a review consistent with the 31 Texas Administrative Code (TAC) § 375.61 and the National Environmental Policy Act (NEPA), 42 U.S. Code § 4321 *et seq.* Consistent with 31 TAC § 375.65, the Environmental Information Document (EID)¹ for the New Wastewater Treatment Plant project proposed by the City of Moody (City) was reviewed by TWDB for the development of this Environmental Assessment (EA). This project is financed through the Clean Water State Revolving Fund (CWSRF) Equivalency Program, which is administered by the TWDB.

PURPOSE AND NEED

The existing wastewater treatment plant (WWTP) is over 40 years old and considered to be in poor condition and reaching the end of its useful life. Subsequent a condition assessment, the following components of the WWTP were found to be in poor condition and at the end or beyond their useful life: influent manual bar screen, treatment facility (oxidation ditch), aeration equipment, clarifier basins, waste-activated sludge (WAS) pump station, sludge drying bed, chlorine facility, site piping, and site electrical. In addition, the standby generator is inoperative.

The City’s WWTP has had several Texas Commission on Environmental Quality (TCEQ) effluent permit violations over the years. In 2019, the TCEQ placed more stringent effluent limits on biochemical oxygen demand (BOD5) and total suspended solids (TSS), which resulted in a Notice of Enforcement to the City in 2020 for 10 separate accounts of effluent limit violations. The violations are attributed to a combination of electrical and equipment failures, as well as insufficient plant processes and hydraulic capacity. Effluent limit violations are reported for multiple months within one calendar year between 2019 and 2024, the most significant year being 2022 with 10 months of reported effluent limit violations.

The purpose of this project is to rehabilitate the aging infrastructure of the WWTP and correct deficiencies to meet the requirements of the TCEQ permit and increase the capacity of the WWTP to accommodate the increasing population of the City.

¹ City of Moody (June 9, 2026). Environmental Information Document (EID) (TWDB Form 0801), Prepared by ICF. Received by TWDB on September 16, 2025, the EID is complete with the supplementary materials submitted to the TWDB on June 9, 2026.

PROJECT FUNDING

To address these issues, the City applied to the TWDB for financing through the CWSRF program for planning, design, and construction, as well as to acquire land and easements. On August 10, 2023, the TWDB committed \$11,432,583 for the project. The City closed the financing on December 14, 2023. Some of the planning funds were used to assess the potential environmental impact of the project and prepare an Environmental Information Document (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.

PROJECT DESCRIPTION

The City proposes to construct a new 0.30 million-gallons-per-day (MGD) wastewater treatment plant (WWTP) on a 3-acre parcel north of the City's existing WWTP, which will be decommissioned and demolished.

The project components in this EA include:

- **New 3-acre WWTP site**
 - Vegetation clearing and excavation for construction within and adjacent to perimeter fence
 - Install approximately 1,100 linear feet (LF) of perimeter fence
 - Construct approximately 800 LF of new 15-foot-wide access road
 - Install new main process unit with a single treatment train including aeration, clarification, and disinfection. Includes 3/8-inch mechanical bar screen, coarse bubble aeration basin, circular clarifier basin, chlorine contact tank, two non-potable water vertical turbine pumps, one airlift pump, and two sludge holding tanks
 - Construct new duplex lift station (approximately 10-foot diameter)
 - Construct new lab/electrical/blower building. Includes aeration blowers and gas chlorine facility.
 - Construct new sludge press building with dewatering bin pad and reuse of existing sludge rotary press
 - Construct new composting facility
 - Install new standby generator
 - Install new effluent outfall piping and outfall (sited in uplands upgradient and outside of stream)
 - Install associated yard piping improvements
 - Install electrical utilities
 - Install new motor control center and associated instrumentation
 - Install Supervisory Control and Data Acquisition (SCADA) facilities, as funding allows

- Existing WWTP site
 - Should construction funding allow, the following components of the existing WWTP are proposed to be demolished: bar screen, lab/pump building, chlorine contact unit, clarifiers 1 and 2, oxidation ditch, and sludge drying bed.

EVALUATION OF ALTERNATIVES

In addition to the Preferred Action Alternative, the City evaluated the No-Action Alternative and the Alternative Not Selected. Each alternative was evaluated for its potential direct, secondary, and cumulative impacts on the existing environment.

No-Action Alternative

Not completing the improvements under the Preferred Action Alternative would allow the existing WWTP equipment to continue aging and deteriorating, which would continue and likely exacerbate existing wastewater treatment and effluent flow issues over time. Due to contemporary higher-strength wastewater compared to when the WWTP was constructed, the WWTP would be unable to keep up with the City's wastewater treatment demands. If the No-Action Alternative were selected, the WWTP would continue to exceed TCEQ effluent limits and receive permit violations and/or Notices of Enforcement, as well as penalties. The discharge of effluent flow would continue to contaminate surface water, adversely affecting water quality. Therefore, surface water quality would be worse under the No-Action Alternative. Further, the wastewater treatment needs of the City of Moody and its growing population would not be met under the No-Action Alternative, limiting capacity to safely accommodate the current population and anticipated growth.

If the No-Action Alternative were selected, direct impacts anticipated from construction of the Preferred Action Alternative would not occur. The No-Action Alternative would not impact land use, prime and important farmland, wildlife resources, native vegetation, or air quality, resources anticipated to be affected by the Preferred Action Alternative due to construction activities. The No-Action Alternative would not involve vegetation clearing, excavation, or other project components that would impact land use, prime and important farmland, native vegetation, and wildlife. Further, operation of machinery, which would adversely impact air quality under the Preferred Action Alternative during construction, would not occur under the No-Action Alternative. Sludge disposal under the No-Action Alternative would require transit to accepting landfills, resulting in added costs and emissions affecting air quality. Collectively, adverse impacts under the Preferred Alternative are anticipated to be minor in intensity, extent, and duration and would be comparatively less in magnitude than the adverse effects of the No-Action Alternative on surface water quality.

Impacts to low income or minority populations would be greater under the No-Action Alternative compared to the Preferred Action Alternative. Under the No-Action Alternative, the disadvantaged community of Moody would continue to experience adverse impacts from inadequate wastewater treatment facilities, hindering the ability of the community to provide adequate wastewater treatment for current residents. Further, the No-Action Alternative would limit the capacity for growth within the community, limiting economic opportunities in the future. Adverse effects may also occur from continued and likely exacerbated deterioration of surface water quality from wastewater effluent, affecting downstream resources that may provide

recreational resources to the community. The No-Action Alternative would not affect groundwater quality and quantity, floodways or floodplains, vegetation and habitat trust resources, endangered species habitat, and cultural resources.

Secondary impacts of the No-Action Alternative would primarily include adverse indirect effects to water resources over time, both near and distant to the project area. The Preferred Action Alternative would serve to improve the effluent quality in the city by installing new facilities that are equipped to handle higher-strength wastewater before it discharges into the unnamed tributary of Stampede Creek. Therefore, if the No-Action Alternative is selected, it is anticipated that the continued degradation of the existing WWTP would continue to impair and decrease surface water quality, adversely affecting downstream waterbodies, including the unnamed tributary, Stampede Creek, Belton Lake, and ultimately the Leon, Little, and Brazos Rivers. Biotic resources, such as fish and wildlife, and vegetative communities, such as wetlands, associated with those downgradient features could experience indirect adverse effects from low or lowered surface water quality.

Past, present, or reasonably foreseeable future projects that impact the same resources as the No-Action Alternative consist of any projects that seek to expand the City for the gradually increasing population. The WWTP serves the City of Moody residential areas and commercial properties including, gas stations, schools, and offices. By limiting the capacity of the WWTP under the No-Action Alternative, the potential for the City to further develop and continue to support residential and commercial uses would be limited. Therefore, if the No-Action Alternative is selected, the City's existing WWTP would not be able to support the wastewater treatment needs of the expected population increase through the 2060 design year.

Implementing the No-Action Alternative is not feasible in response to the deteriorating facilities and would not meet the project purpose and need. The City would continue to experience problems with capacity and effluent limitations. Not completing the WWTP rehabilitation under the Preferred Action Alternative to the City's WWTP would allow the continuation of existing issues, which would likely worsen over time. Since the new WWTP improvements have an increased capacity and better technology to treat pollutants more efficiently and to serve the wastewater treatment needs of the gradually increasing population, in the future under the No-Action Alternative, potential development may not occur in the City due to safety and load capacity issues. Implementing the No-Action Alternative would require no direct monetary outlay; however, continuous effluent permit violations would result in additional fees to be paid to the TCEQ.

Alternative Not Selected

The Alternative Not Selected consists of the construction of a new WWTP on the existing City-owned WWTP site (i.e., the 1.75-acre Parcel) while the plant remains in operation. The parcel is mostly used at present by the existing plant and for storage. Disadvantages of this alternative include required acquisition of additional land or an easement by the City to the north, east, and west of the existing site in order to meet the 150-foot TCEQ-required buffer zone around process structures. If the Alternative Not Selected was chosen, the WWTP development would be limited to the northern portion of the 1.75-acre parcel and would not allow for further expansion due to spatial limitations. Expansion capacity would be limited by the cemetery to the south and the privately owned parcels to the north, east, and west. Under this alternative, future

developments could not occur on the privately owned parcels. In addition, the available location of the new plant does not allow for further expansion on this site due to the need to keep the existing plant in operation during construction of the new plant under this alternative.

Proposed construction activities under this alternative include the replacement of facilities and equipment that are considered in poor condition. Project components (including construction and demolition) under the Alternative Not Selected and the Preferred Action Alternative would remain the same, apart from the access road. Under the Alternative Not Selected, an access road would be constructed from the northeastern corner of the property, leading to the sludge dewatering bin/press building. During construction under the Alternative Not Selected, the 3-acre parcel of the project site would be utilized as a staging area.

Under the Alternative Not Selected, the proposed construction activities would not occur on undeveloped land and, therefore, would not permanently impact the land use in the project area. The land is currently used as the existing WWTP that is largely comprised of fill material and would remain as such. Only the northwest corner of the property is recognized as having soils designated as prime farmland. Although soil excavation would be similar between the Alternative Not Selected and the Preferred Action Alternative, impacts to prime farmland designated soils would be less under this alternative compared to the Preferred Action Alternative. However, impacts to prime farmland soils at both sites would be minimal given the current site conditions, past manipulation, and inclusion of primarily fill materials.

The outfall location under the Alternative Not Selected would remain the same as for the existing WWTP, discharging to the roadside ditch and then into the unnamed tributary of Stampede Creek. The new plant equipment would allow the effluent discharge to be within TCEQ limits and, therefore, would result in similar impacts to waterways as the Preferred Action Alternative, benefiting surface water quality and associated vegetation and wildlife by increasing treatment efficiency and decreasing discharge of pollutants in effluent compared to the No-Action Alternative.

This alternative would have less impacts to native vegetation and wildlife habitat than the Preferred Action Alternative due to the smaller limits of construction and because the site is currently operated as a WWTP and is mowed and maintained by the City. Neither alternative would have substantial impacts on native vegetation and habitat, as most of the areas to be disturbed under both alternatives consist of frequently disturbed (i.e., mowed) grasses composed largely of non-native species, including Bermudagrass (*Cynodon dactylon*) and Johnsongrass (*Sorghum halapense*).

Impacts to air quality under this alternative and the Preferred Action Alternative would be adverse and similar in scale. Both alternatives would require operation of construction equipment, combusting fossil fuels that would adversely affect air quality in the immediate vicinity of the project area temporarily during construction. Neither alternative would have long term impacts on air quality.

Temporary adverse impacts to surface water quality are not anticipated during construction for both the Alternative Not Selected and the Preferred Action Alternative due to the use of best management practices (BMPs) to avoid such impacts. Neither this alternative nor the Preferred Action Alternative are anticipated to impact the following resources and would, therefore, be

similar in effect: geology, groundwater quality/quantity, floodways and floodplains, endangered species habitat, cultural resources, hazardous materials, social implications and environmental justice, scenic views, and traffic.

The secondary and cumulative impacts under the Alternative Not Selected would be similar to those described for the Preferred Action Alternative below.

Similar to the No Action Alternative, past, present, or reasonably foreseeable future projects that impact the same resources as the Alternative Not Selected consist of any projects that seek to expand the City for the gradually increasing population. The WWTP serves the City's residential areas and commercial properties including gas stations, schools, and offices. By limiting the size of the WWTP to the existing 1.75-acre parcel under the Alternative Not Selected, the capacity for the City of Moody to further develop and support residential population growth would be limited. The Alternative Not Selected would not allow for future expansion of the City WWTP. Such limitations on expansion could hinder future growth due to the inability to serve residential and commercial customers.

This alternative was evaluated and rejected based on its additional need for land acquisition or an easement to meet the TCEQ requirement for a 150-foot buffer zone around process structures, the complexities of needing to continue to operate the existing WWTP while upgrading facilities, and due to the limited size of the 1.75-acre parcel, which would restrict future expansion. Construction of the new facilities while the existing WWTP is in operation would be challenging, and the parcel size would not allow for further expansion, should it be necessary in the future. Further, steps necessary to meet the TCEQ buffer requirement would introduce added project costs.

In addition, the demolition of the existing WWTP is proposed should funding allow under the Preferred Action Alternative. Under the Alternative Not Selected, the demolition of the existing WWTP using TWDB funding would be required. Therefore, this alternative would collectively require a higher cost for construction activities.

Preferred Action Alternative

The Preferred Action Alternative is described above under the Project Description.

The proposed project was selected as the Preferred Action Alternative to best address the issues the City is experiencing with TCEQ effluent limit violations and deteriorating equipment and facilities in comparison with the No-Action Alternative and the Alternative Not Selected. The proposed project is preferable based on comparison of environmental impacts and financial evaluation of cost/benefits. The No-Action Alternative would not meet the purpose and need for the proposed effluent and capacity improvements and would present additional adverse environmental impacts for surface water quality and associated wildlife and vegetation communities. The disadvantaged community of Moody would continue to be underserved with regard to wastewater treatment and associated adverse effects. Additionally, permit violation fees and actions from the TCEQ would continue for the City, with potential permit revocation, which may cost more over time than rehabilitating the WWTP. The Alternative Not Selected would require land acquisition or easement attainment and present additional difficulties during construction while the existing plant remains in operation and should the WWTP require further

future expansion. For example, should the need arise to expand the WWTP to the south, impacts to the Naler Cemetery south of the 1.75-acre parcel may occur and result in the need for coordination under Section 106 of the National Historic Preservation Act (NHPA). As such, the Preferred Action Alternative was selected over the No-Action Alternative and the Alternative Not Selected. The Preferred Action Alternative was carried forward due to its noted comparative benefits: allowing project construction while simultaneously operating the existing WWTP; having the capacity for future expansion; encapsulating the required TCEQ buffer area without acquisition need of additional properties or easements; its limited impacts on environmental, cultural, and socioeconomic resources, as documented herein; and others.

ENVIRONMENTAL REVIEW

Consistent with the requirements of the federally funded CWSRF program, the City 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.

Adverse effects on social and natural resources fall under the authority of various agencies. These regulatory agencies and participating area residents had the opportunity to address potential 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

Land Use

The proposed project would be constructed in the city of Moody and would serve the population of the City. The project is located in the southern portion of McLennan County, approximately 25 miles southwest of Waco.

The 3-acre parcel of the proposed project site is currently undeveloped land that has been used by the City to store fill material and small equipment. The project proposes to convert the land from undeveloped to a municipal wastewater facility. The existing 1.75-acre WWTP parcel will experience decommission of the existing plant, demolition of specific infrastructure, and relocation of reusable equipment; however, the property will remain developed with remnant facilities and maintained by the City for storage and other activities, similar to the current use of the 3-acre site.

Review of contemporary and historical imagery indicates that the project site is largely rural in nature, with agricultural land uses prevalent to the west and continued expansion of residential and commercial developments and associated road infrastructure development with the growth of the City of Moody to the east. The existing WWTP was built in 1978 on the 1.75-acre parcel. This land is mowed and maintained by the City. Review of historical aerial imagery since 1958 suggests that the site was undeveloped prior to construction of the WWTP but exhibited land disturbance and human use predating that development. The 3-acre parcel on which the new WWTP is to be built appears to have supported throughout most of the parcel and its eastern extent (excluding the riparian corridor) an artificial two-reservoir pond system from 1958 until

sometime before 1995, at which time the reservoir was mostly filled. Early imagery for this parcel shows the site surrounded by agricultural land uses with the riparian corridor non-wooded until 1964, at which time a woodland corridor is evident and which remains today.

In the 1995 imagery, a waterbody or flooded area is depicted in the northern portion of the 3-acre parcel with a smaller waterbody in the southwestern portion. Both waterbodies are absent in the 2004 imagery. No other water features appear throughout more recent years. Currently, the 3-acre parcel of the project site is used by the City to store fill material, which has developed a layer of herbaceous vegetation over time.

Land use surrounding the project site primarily consists of agricultural farmland, the continuation of the riparian woodland corridor of the unnamed tributary, and residential properties. The City of Moody is located east of the project and has not experienced significant development in recent years. South of the 1.75-acre parcel that houses the existing WWTP, land use includes Naler Cemetery, which was first used in 1863 and chartered in 1900. To the east and adjacent to the 3-acre project site, land use was converted from undeveloped to rural residential properties between 2012 and 2015. The project serves the residential and commercial properties of the City and, therefore, is compatible with adjacent and nearby land uses.

Geology and Soils

The project is located within the Gulf Coast Plains Physiographic Province of Texas, Blackland Prairie Subprovince, where “chalks and marls weather to deep, black, fertile clay soils. The blacklands have a gentle undulating surface, cleared of most natural vegetation and cultivated for crops.”² The surface geology of the project area includes Pepper Shale (Kpe) of the Woodbine Group. The Kpe geologic rock unit is a narrow formation positioned between Grayson Marl (“Del Rio Clay”) (Kgy) of the Washita Group and Lake Flow Formation (Klw) of the Eagle Ford Group. The Kpe geologic rock unit begins south of the Brazos River and continues southward to Travis County where it becomes thinner, pinching out by overlap of the Quaternary-aged Alluvium (Qal) rock unit. The thickness of the Kpe geologic rock unit in central McLennan County is 75 feet or less, then thins out to 20 feet around Travis County. The Kpe geologic rock unit is made up of shale from the Cretaceous Period that consists of pyritic, massive, breaks with blocky fracture, ranging from thin to very thinly laminated. Weathering of the Kpe geologic rock unit can develop fissility, selenite, and jarosite.

There are no faults or other pertinent geologic features mapped in the project area. The project is not located in a karst or pseudo-karst zone. No direct impacts to geology are anticipated.

According to the United States Department of Agriculture – Natural Resources Conservation Service (USDA-NRCS) Web Soil Survey data, soils on the 3-acre parcel of the project site where earth work will occur for the new WWTP construction are mapped as Heiden clay, 1 to 3 percent slopes (HeB). The farmland classification for this soil type is “all areas are prime farmland.” However, the site is currently non-agricultural land that has been disturbed throughout most of the parcel for reservoir construction and agriculture, subsequently filled, and currently used by the City for fill material storage. Since the project site has not been farmed

² Wermund, E.G. (1996). “Physiography of Texas.” Bureau of Economic Geology, the University of Texas at Austin.

since before 1958 (based on the review of historical aerial imagery), followed by extensive soil disturbance and placement of fill materials, little-to-no direct impacts to soils considered prime farmland are anticipated for the project. Most of the 1.75-acre parcel where the existing WWTP is located consists of fill material that is mapped as Lott silty clay, 5 to 8 percent slopes (LoD), which is not prime farmland. A small portion of the northwestern extent of this parcel is mapped as HeB soils; however, demolition activities are not anticipated to affect this area or these soils.

Soil will not be moved off site and will not be contaminated as a result of the project.

Water Resources

The project is located in the United States Geological Survey (USGS) hydrologic unit Code (HUC) 06 Brazos River Basin. The source of the City's water supply is from surface water, Belton Lake, and groundwater from the Trinity major aquifer. There are no Environmental Protection Agency (EPA) designated sole source aquifers in the project area. This project would not increase the capacity of the City's water systems or significantly adversely affect the availability or safety of the local water supply.

The proposed project also does not involve significant impacts to water quality. The proposed project would involve the construction of a new outfall that would discharge into an intermittent stream (see discussion below in the Wetlands, Streams, and Waters of the United States section). A Total Maximum Daily Load (TMDL) has not been established for this waterbody.

Wastewater effluent discharge can alter the biological and chemical composition of receiving waters through temperature fluctuations, the input of nutrients and emerging contaminants, and the alteration of streamflow. However, WWTPs are generally accepted as the preferred method of waste management to improve water quality over on-site sewage facilities (OSSF) that may impact waterbodies to a greater degree due to unregulated sewage from OSSFs leaking into surface and groundwater. This proposed project will increase the flow capacity of wastewater treatment in the City. However, surface water quality will directly benefit from increased wastewater treatment and reduction in the concentration of pollutants discharged in effluent, compared with the existing, aging system.

The proposed project will require a new TCEQ Texas Pollutant Discharge Elimination System (TPDES) discharge permit. The City will be applying for a new discharge permit for the proposed WWTP since it is on a new parcel. The existing permit is for 0.2 MGD, and the new permit application will be for 0.3 MGD. The outfall for the new WWTP will be going to the same stream as the existing WWTP. The proposed WWTP will be using the same type of activated sludge treatment, so we anticipate that the new discharge permit will have the same 10 milligrams per liter (mg/L) limit for biochemical oxygen demand (BOD); 15 mg/L limit for total suspended solids (TSS) and 3 mg/L limit for ammonia nitrogen.

Temporary surface water runoff impacts are expected during construction. A National Pollutant Discharge Elimination System (NPDES) permit will be acquired, and a Stormwater Pollution Prevention Plan (SWPPP) will be implemented by the contractor with erosion control best management practices (BMPs) in place prior to construction. The BMPs will act to minimize dust, sedimentation, erosion, and pollution to surface waters.

Topography and Floodplains

Elevation across the project area ranges from approximately 730 to 775 feet above mean sea level. The project area can be characterized as generally flat with minimal elevation changes throughout most of the area. The 1.75-acre parcel where the existing WWTP is located is generally flat, consisting primarily of fill materials and was manipulated during past construction. The site slopes gently uphill to the south towards the existing oxidation ditch, which is contained within a minor artificial berm. Across the street at the 3-acre parcel where the new WWTP is proposed, topography is generally flat due to historic disposal of fill material and past manipulation. However, outside of this disposal area, the site slopes steeply downgradient towards the existing stream system to the southwest.

No permanent impacts to the floodplain or floodway are anticipated to occur because there is no floodplain as designated by Federal Emergency Management Agency (FEMA) flood rate insurance maps (FIRM) in the project area. The City and McLennan County participate in the National Flood Insurance Program (NFIP).

Wetlands, Streams, and Waters of the United States

The project area is located within the HUC 10 watershed of Belton Lake. A waters of the U.S. (WOTUS) delineation report³ was prepared in order to identify potential waterbodies at the project site. The report identified two intermittent streams and one ephemeral stream in the project area. Stream 1, an unnamed intermittent stream flows into several other unnamed tributaries before their confluence with Stampede Creek, which is a tributary of Belton Lake. Belton Lake outflows to the Leon River, which ultimately flows to the Brazos River. From its northern terminus at the project site, Stream 2, an unnamed intermittent stream, flows southwest and converges with Stream 1 and the roadside ditch at the southern boundary of the project area's northern parcel. Streams 1 and 2 were determined by ICF to likely be jurisdictional streams under Section 404 of the Clean Water Act because they are relatively permanent tributaries with a direct surface connection to the Brazos River, a traditionally navigable waterway. Stream 3 is a 29-foot in length unnamed ephemeral tributary to Stream 1 that flows from east to west within the northern 3-acre project area parcel. No wetlands were identified on the project site during field delineation. The National Wetland Inventory (NWI) maps two freshwater ponds (PUBFx) on the 3-acre project site parcel; however, these features are not present on the previously disturbed site.

The proposed project is not anticipated to locate project components within the ordinary high water mark of the three streams at the project site. The outfall will be sited entirely in uplands.

Biological Elements

The project area is located within the Environmental Protection Agency (EPA) Level III Texas Blackland Prairies Ecological Region. A biological assessment was conducted by desktop and field review as part of the WOTUS delineation. Databases of sensitive species maintained by the United States Fish and Wildlife Service (USFWS) and Texas Parks and Wildlife Department

³ City of Moody (June 2025). Waters of the U.S. Delineation for the City of Moody Wastewater Treatment Plant Project, prepared by ICF, for MRB Group, PC.

(TPWD) were reviewed to verify any state and/or federally listed threatened or endangered species that occur, or have historically occurred, in McLennan County.

The project site is comprised of the existing WWTP (1.75-acre parcel) and undeveloped land (3-acre parcel) where the new WWTP is proposed. Both sites have been previously disturbed. The existing WWTP parcel is predominantly vegetated by mowed and maintained herbaceous species. Dominant herbaceous species include dallisgrass (*Paspalum dilatatum*), Bermudagrass (*Cynodon dactylon*), slender yellow woodsorrel (*Oxalis dillenii*), and straggler daisy (*Calyptocarpus vialis*). Along the western, southern, and a portion of the eastern boundaries, the fenceline is partially wooded with an overgrown understory composed of the herbaceous species mentioned, in addition to spreading hedgeparsley (*Torilis arvensis*) and woody vines, such as eastern poison ivy (*Toxicodendron radicans*), Virginia creeper (*Parthenocissus quinquefolia*), roundleaf greenbrier (*Smilax rotundifolia*), mustang grape (*Vitis mustangensis*), and Japanese honeysuckle (*Lonicera japonica*). Canopy cover here was observed to consist of invasive Chinaberrytree (*Melia azedarach*), as well as native cedar elm (*Ulmus crassifolia*) and sugarberry (*Celtis laevigata*).

Where the new WWTP is to be sited, approximately half of the 3-acre parcel is vegetated by maintained herbaceous cover, dominated by field brome (*Bromus arvensis*), perennial ryegrass (*Lolium perenne*), Johnsongrass (*Sorghum halepense*), Bermudagrass, and spreading hedgeparsley. The existing fenceline at the toeslope of the hill (comprised of fill material) along the northern and eastern boundaries was observed to support moderate tree cover consisting primarily of netleaf hackberry (*Celtis reticulata*). The understory along these boundaries was dominated by herbaceous species, including spreading hedgeparsley, Virginia wildrye (*Elymus virginicus*), silverleaf nightshade (*Solanum elaeagnifolium*), Johnsongrass, and great ragweed (*Ambrosia trifida*), as well as netleaf hackberry saplings.

The riparian woodland corridor in the western portion of the 3-acre parcel was observed to be partially wooded and situated along the unnamed stream. Dominant canopy species noted include netleaf hackberry and black willow (*Salix nigra*). Dominant understory vegetation included great ragweed, Johnsongrass, spreading hedgeparsley, coralberry (*Symphoricarpos orbiculatus*), annual marsh elder (*Iva annua*), rescuegrass (*Bromus catharticus*), and Virginia wildrye.

No aquatic wildlife species were observed within the streams on the project site. However, the intermittent stream channels of the project site likely support aquatic wildlife species common to the region. These could include common turtles, fish, frogs, aquatic insects, snakes, wading birds, and other species typically associated with freshwater intermittent streams of the ecoregion. Aquatic vegetation was not observed within the project site.

The riparian woodland corridor and wooded fencelines may provide suitable habitat for reptile and small mammal species common to the Texas Blackland Prairies. In addition, avifauna typical of the region, including migratory birds, owls, hawks, and other raptors, may perch or nest in trees of the project area, and forage within the woodlands and overgrown herbaceous areas. Vegetation communities observed in the project site are common on the landscape, have been disturbed and fragmented by past and on-going human use, and are not unique. As such, the wildlife species they support are typical to the region and include those species that are habitat generalists.

Although the tricolored bat (*Perimyotis subflavus*), a species proposed for federal listing as endangered, is known to occur in McLennan County, the USFWS IPaC review for the project site does not include the area within the range requiring consultation for the species. Following guidance by USFWS, the project is not anticipated to impact the species.

Potential foraging and sheltering habitat for the monarch butterfly (*Danaus plexippus*), which is proposed for federal listing as threatened, was identified by ICF in the project area. Milkweeds required to serve as breeding host plants for the species were not observed during the WOTUS delineation field visit on May 13, 2025. If the species is present at the time of construction, the adult butterflies would be anticipated to relocate to nearby suitable habitat and not be impacted by project activities. Further, impact to eggs, larvae (i.e., caterpillars), and chrysalides are not expected due to absence of breeding host plants. Post-construction return of the project site to herbaceous cover may continue to provide foraging resources for the species.

ICF identified potentially suitable foraging habitat for the bald eagle (*Haliaeetus leucocephalus*) and golden eagle (*Aquila chrysaetos*) in the project area, but no breeding habitat. Any occurrence of these species in the project area would be unlikely due to the lack of eagle attractants (i.e., large waterbodies), and should there be an occurrence, it would be temporary in duration. Since these species are transitory, it is anticipated that they would be deterred from any disturbance during construction and utilize adjacent or nearby suitable habitat. Potentially suitable habitat identified is common in the region and does not represent unique foraging habitats for either species. Permanent impacts to potential habitats from the proposed project are anticipated to be negligible and, therefore, the Preferred Action Alternative is not anticipated to adversely impact or affect state or federally protected species.

The project design will minimize adverse impacts where possible, siting most of the proposed new WWTP facilities within previously disturbed areas that exhibit a long history of human activity and manipulation. The spatial extent of impacts is expected to be localized. The proposed project is not expected to significantly alter native vegetation and wildlife resources. On the 3-acre parcel, proposed facilities siting is primarily within disturbed, ruderal herbaceous vegetation growing on fill materials. The proposed access road and perimeter fence intersect and encompass a minor extent of riparian woodland in the northwest. It is anticipated that all vegetation within the perimeter fence will be cleared and subsequently maintained in herbaceous vegetation. As such, approximately 0.3 acres of woodland will be converted to maintained herbaceous cover.

Permanent adverse impacts to wildlife are expected to be minor, resulting from the conversion of woodland to herbaceous cover. Adverse construction impacts to wildlife resources will be largely temporary, extending over a short duration during construction. During construction, mobile wildlife species may avoid or be temporarily displaced from the project area but would be expected to return post-construction. As previously discussed, temporary or permanent adverse impacts to aquatic habitats are not anticipated during construction due to the use of BMPs to avoid such impacts. Further, long-term beneficial impacts to aquatic resources will result from the increased treatment of effluent discharged into the unnamed intermittent tributary, eliminating discharges beyond the TCEQ permitted limits that are currently occurring and that would continue and likely be exacerbated under the No-Action Alternative. Impacts to trust resources are not anticipated for the project.

Due to the maintained nature of the project site, the construction of the project under the Preferred Action Alternative is not anticipated to significantly impact vegetation or wildlife resources. Vegetation in the project area includes constituent non-native species.

The proposed project is not anticipated to affect federally listed or proposed threatened and endangered species, and other federally protected species of known or potential occurrence in McLennan County. It is also anticipated that there will be *No Effect* from the project on all state-listed species of known or potential occurrence in McLennan County. No designated critical habitat, or habitat proposed for listing, for federally listed or proposed species is located within the project site, project area, and immediate vicinity. Further, recorded occurrences of federally or state listed threatened or endangered species, as well as proposed species for such federal listing, and other federally protected species are absent from the project area and a five-mile vicinity.

No state or national parks, forests, wildlife refuges, wild or scenic rivers, or natural areas or similar preserves are located within the project area.

Cultural Resources

ICF on behalf of the City conducted a desktop review to identify historic properties, archeological sites, and cultural resources near the project area. The report, dated June 10, 2025, found that no cultural resources or historic properties included in or eligible for inclusion in the National Register of Historic Places (NRHP) within the project's area of impact. One historic district (Downtown Moody Historic District) eligible for listing in the NRHP was identified approximately 0.12 mile east of the project site. The historic district has 13 contributing resources and two individually NRHP-eligible commercial resources within its boundary. The results of the cultural resources report recommended that further cultural resource investigations are unwarranted, and an archaeological survey should not be required.

There are no historic properties or districts listed in the NRHP or standing structures designated as State Antiquities Landmarks within the project area. Therefore, the proposed activities are not anticipated to impact historic properties or cultural resources.

Hazardous Materials

There are no Superfund Sites from the EPA National Priorities List located on the proposed subject property or in areas associated with the proposed project. A Phase I Environmental Site Assessment has not been conducted. The TWDB does not fund the testing, remediation, removal, disposal, or related work for contaminated or potentially contaminated materials.

Socioeconomics

A socioeconomic analysis was performed on June 3, 2025, within a 0.5-mile radius of the project area using data from the U.S. Census Bureau (USCB) Quickfacts, generated July 1, 2024, and 2023 5-year estimates from the USCB American Community Survey. Data include the population, percentage of minority residents, percent low income, and per capita income for the project area, for comparison with data for the county and state.

Area	Population	Percent Minority	Percent Below Poverty Level	Per Capita Income
State of Texas	31,290,831	23.2	13.7	\$39,446
McLennan County	270,358	20.7	16.7	\$33,019
City of Moody	1,258	30	22.4	\$28,060
Project Area (0.5-mile buffer)	571	42	-	-

The socioeconomic analysis indicates that 42 percent of the population within 0.5-mile of the project are members of a racial/ethnic minority category. 30 percent of City residents are members of a racial/ethnic minority and 22.4 percent have incomes less than or equal to the state's official poverty level, which are both greater than the average for McLennan County and the State of Texas. The per capita income for the City is less than that of the County or State.

The project will require an increase in monthly service rates of approximately 48 percent, with a current average monthly user rate of \$32 and an anticipated increase of \$16.80. The proposed project will require an increase in taxes to finance the debt. To meet the required debt service coverage ratio, the estimated interest and sinking tax rate required is \$0.05. The maintenance and operation tax rate would remain the same. The total tax rate is estimated to increase from \$0.589 to \$0.639, with a maximum allowable rate of \$1.50.

People or businesses will not be relocated as a result of the project and eminent domain will not be required. The entire population of this project area will be the recipients of benefits derived from the proposed improvements. The project purpose is to provide improvements in wastewater treatment capacity to the underserved community of Moody. Therefore, the project will not disproportionately, adversely affect minority or low-income populations.

Secondary and Cumulative Impacts

The project may temporarily impact air quality and vegetation. Temporary increases in air emissions will occur from construction machinery; however, air quality will not be adversely impacted in the project vicinity after construction is complete. Past projects including the construction of the existing WWTP, sewer and/or water line construction, and road construction projects may have impacted the same resources. Future projects including improvements to the WWTP, water/sewer line construction projects, and road construction projects also may impact the same resources. The Moody WWTP is the only outfall discharging into the Stampede Creek HUC 12 subwatershed. Three additional WWTP outfalls ultimately discharge into the Leon River by the time the river outlets from Belton Lake, approximately 25 miles downstream of the Moody WWTP.

Secondary impacts of the Preferred Action Alternative will primarily include beneficial indirect effects to water resources over time both near and distant to the project area. The proposed project will improve the water quality of effluent flow discharged by the City to the unnamed tributary of Stampede Creek. Therefore, with the proposed improvements, it is anticipated that surface water quality will improve and continued adverse impacts to surface water quality will be discontinued. Adverse effects to surface water quality to downstream waterbodies, including Stampede Creek, Belton Lake, the Little River, Leon River, and Brazos River, will be minimized

or avoided. Aquatic resources, such as fish and wildlife, and vegetation, such as wetlands, associated with those downgradient features could experience indirect, long-term beneficial effects from maintained or improved surface water quality.

Further, secondary and cumulative benefits will occur over time and throughout the community from the Preferred Action Alternative. Specifically, increased wastewater treatment capacity and efficiency to service the City will allow continued servicing of residential and commercial uses and create capacity for growth overtime. Without the proposed improvements in wastewater treatment, inefficiencies would continue in servicing the existing uses and capacity for future growth would be greatly limited, as TCEQ permit violations would continue, creating financial, environmental, and social costs.

Past, present, or reasonably foreseeable future projects that impact the same resources as the Preferred Action Alternative consist of any projects that seek to expand the City for the gradually increasing population. These projects would require increased wastewater conveyance to the WWTP than is currently achieved and manageable by the existing plant. Under the Preferred Action Alternative, the capacity of the WWTP will increase, resulting in the ability for the City to further develop and support residential and commercial uses. Socioeconomic benefits would result from increased residential and commercial development. However, such developments could adversely affect environmental and cultural resources, such as prime and important farmlands, native vegetation and wildlife, wetlands, streams, archeological resources, and others discussed herein. However, the anticipated growth for the City is minor and improvements to the WWTP are required to service the existing population and uses. Therefore, capacity and treatment improvements in the WWTP under the Preferred Action Alternative are not anticipated to cause increased development in the region, but rather, more effectively and efficiently treat current uses with added capacity for minor growth in the future. Therefore, the proposed project is not anticipated to change the projected rate, density, or type of development in the vicinity of the project area. The land use in surrounding areas will generally remain in agricultural and residential uses following the construction of the project.

The project will not involve rerouting traffic. Temporary traffic control delays during work hours are anticipated for material delivery. Impacts from odors generated from the existing WWTP are not currently encountered. With the increased capacity of the proposed new WWTP, the potential for odors generated may increase. However, with the upgraded technology and facilities, little to no adverse impacts from odor are anticipated. Night work is not generally anticipated; however, the project may include one night event to switch over from the existing facility to the new WWTP. In addition, temporary adverse impacts from construction noise may occur.

AGENCY COORDINATION AND COMPLIANCE

To ensure due consideration of the project's potential impact, the City prepared an EID describing the results of that investigation, 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 City 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 § 375.61, to ensure compliance with CWSRF 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 state and federal regulatory agencies, local authorities, and other stakeholders and interested parties regarding the project’s potential impact. The City submitted notifications to and requests for input from all required parties. Some entities did not require a response. The respondents are listed below, and the results of coordination are summarized in the EID and reflected in the environmental conditions.

- Texas Historical Commission (THC), State Historic Preservation Officer, Austin in accordance with Section 106 of the National Historic Preservation Act; Antiquities Code of Texas; and other applicable regulations (Tracking No. 202511186)
- United States Army Corps of Engineers (USACE), Regulatory Branch, Fort Worth District, in accordance with Section 404 of the Clean Water Act; and Section 10 of the Rivers and Harbors Act of 1899 (Project No. SWF-2025-00336)
- TPWD, Wildlife Division, Ecological & Environmental Planning Program, Austin, in accordance with the Endangered Species Act of 1973, as amended; Migratory Bird Treaty Act; Texas Parks and Wildlife Code; and other applicable regulations (TPWD Project No. 56268)

- USFWS, Austin Ecological Services Field Office, in accordance with the Endangered Species Act and statutes affecting other federally protected species (USFWS Project Code 2026-0023591)
- USDA-NRCS pursuant to the Farmland Protection Policy Act
- TCEQ in accordance with 40 CFR Part 93 and National Ambient Air Quality Standards (TCEQ NEPA Request No. 2023-058)
- TWDB, National Flood Insurance Program (NFIP) State Coordinator, pursuant to the Flood Insurance Reform Act of 2004, federal Executive Order 11988, Texas Water Code Section 16.315, and local floodplain development ordinances

No response was required from the following entities:

- Bureau of Reclamation, Oklahoma-Texas Area Office
- Bureau of Land Management
- Local Floodplain Administrator pursuant to the NFIP
- Local government (City Mayor, County Judge, Heart of Texas Council of Governments)

Texas Historical Commission

The cultural resources desktop review report, dated June 10, 2025, was reviewed by the THC staff in accordance with Section 106 of the NHPA and the Antiquities Code of Texas. The THC staff concurred with City in correspondence dated June 27, 2025, that no direct impacts to cultural resources/historic properties are anticipated as a result of the project (THC Tracking No. 202511186). An archaeological survey was not required. The THC recommended that if buried cultural materials are uncovered during construction, work should immediately cease in that area and the Archeology Division of the THC should be notified.

United States Army Corps of Engineers

The USACE, Fort Worth District Office, Regulatory Branch staff were given the opportunity to review the project (Project Number SWF-2025-00336). A pre-application meeting was conducted for the proposed project on August 12, 2025. On August 15, 2025, the USACE concurred with the meeting notes documenting that because the proposed outfall is proposed to be sited in uplands, above the OHWM of the unnamed tributary to Stampede Creek, a permit would not be required. However, if the design of the outfall changes at a later stage to be located below the OHWM, the City would need to apply for a Nationwide Permit (NWP) 18. This requirement is reflected in the special conditions within this finding.

Texas Parks and Wildlife Department

The TPWD Wildlife Division, Ecological & Environmental Planning Program staff reviewed the project in accordance with the Texas Parks and Wildlife Code, and provided a response dated August 21, 2025 (TPWD Project No. 56268). The TPWD staff concurred with the City's proposed mitigation measures for potentially affected protected species. Recommendations related to the tricolored bat (*Perimyotis subflavus*) are reflected in the environmental conditions of this environmental finding.

United States Fish and Wildlife Service

The USFWS Austin Ecological Services Field Office, in accordance with the Endangered Species Act and statutes affecting other federally protected species, was given the opportunity to review the project through the Information for Planning and Consultation (IPaC) system (Project Code No. 2026-0023591). The USFWS technical assistance letter dated December 5, 2025, issued a *No Effect* determination for the listed species in the project area and a formal Section 7 consultation was not required.

Texas Commission on Environmental Quality

In a response dated March 30, 2023, the TCEQ stated that a review of the proposed project for general conformity impact, in accordance with 40 CFR Part 93 and Title 30, TAC § 101.30, indicates that McLennan County is currently unclassifiable or in attainment of the National Ambient Air Quality Standards for all six criteria air pollutants (TCEQ NEPA Request No. 2023-058). Therefore, general conformity rules do not apply. The proposed project is in compliance with the State Implementation Plan and the Clean Air Act. The TCEQ further noted that significant long-term impacts are not anticipated.

United States Department of Agriculture – Natural Resource Conservation Service

As required by the Farmland Protection Policy Act (FPPA), the United States Department of Agriculture - Natural Resources Conservation Service (USDA-NRCS) reviewed the proposed project. In a response dated August 1, 2025, the USDA-NRCS provided a Farmland Conversion Impact Rating (form AD-1006).

Although the proposed WWTP site contains Prime Farmland, the combined rating for the project is 112. The FPPA states that sites with a rating less than 160 will need no further consideration for protection and no additional evaluation is necessary. The parcel proposed for demolition is within Moody city limits. The USDA-NRCS considers the location to be "land committed to urban development;" therefore, this parcel is exempt from provisions of FPPA and no further consideration from protection is necessary. The USDA-NCRS further recommended the use of accepted erosion control methods during the construction of the project.

PUBLIC PARTICIPATION

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

Public participation conducted during facilities planning included a public meeting held on August 26, 2025, which was advertised in the *Waco Tribune-Herald*, a newspaper of general circulation in the service area. The notice was published on July 24, 2025, and contained information regarding availability of planning documents, including the EID, for public review at City Hall, Moody, Texas during normal business hours (8 a.m. to 5 p.m.).

The public meeting was held at 5:30 p.m. on at 606 Avenue E, Moody, Texas 76557. A total of five people attended the meeting, none of whom were members of the public. Three City employees attended. Three comments were received and addressed by the project team regarding stream impacts, the TCEQ permit, and agency coordination; no comments were adverse. No other comments were received at the public meeting or during the 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 § 375.65. 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 City, the proposed New Wastewater Treatment Plant Project is considered environmentally sound with the following special and standard environmental conditions:

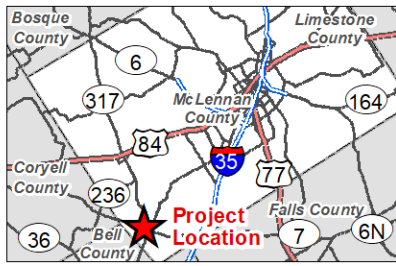
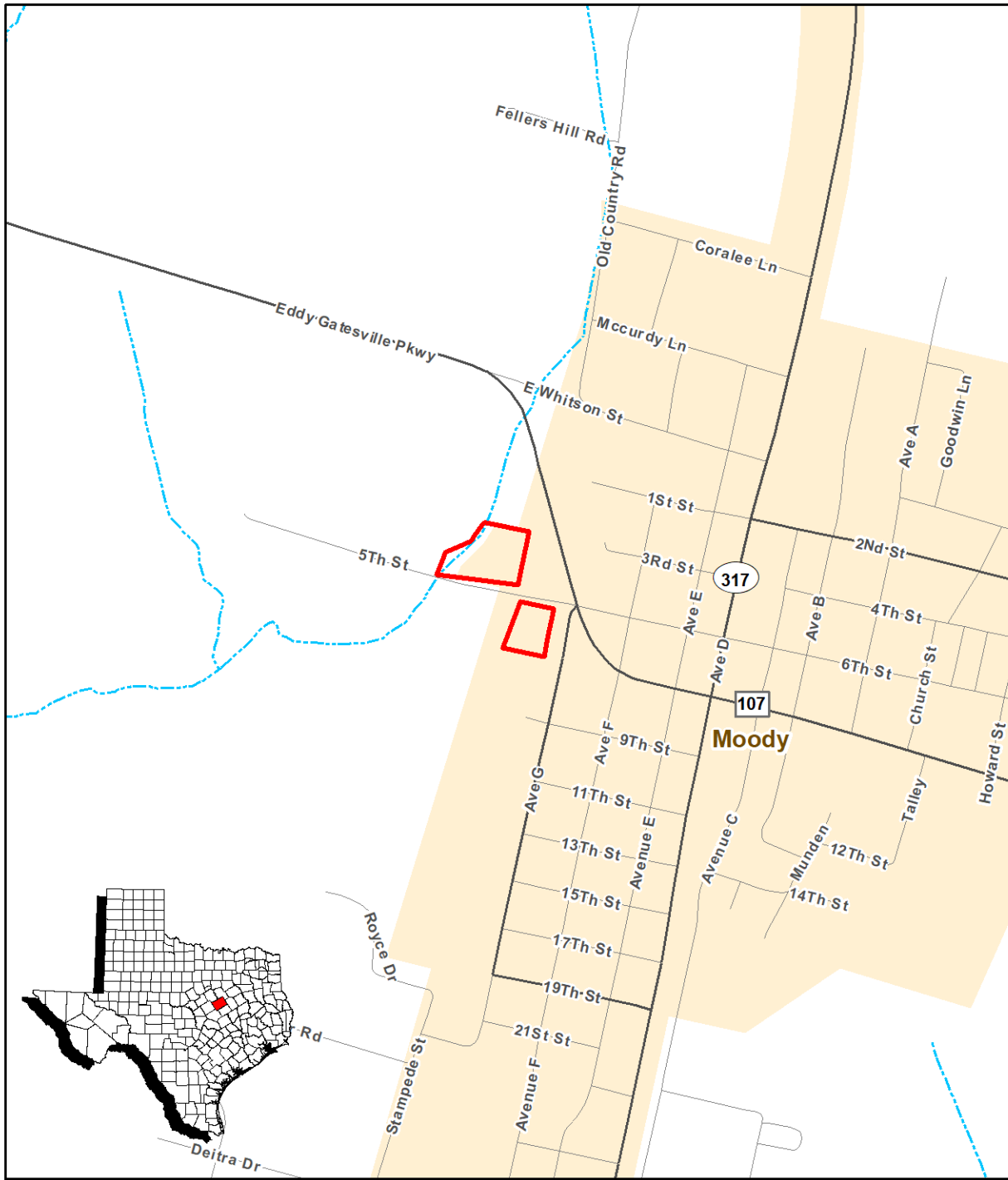
Special Environmental Conditions

- If the design of the proposed outfall changes and the outfall is relocated below the ordinary high water mark (OHWM) of the unnamed tributary to Stampede Creek, the City of Moody (City) will recoordinate with the United States Army Corps of Engineers (USACE) to apply for a Pre-Construction Notification (PCN) for a Nationwide Permit 18 for Minor Discharges.
- As per agreements with the Texas Parks and Wildlife Department (TPWD), Ecological & Environmental Planning Program (TPWD Project No. 56268) and United States Fish and Wildlife Service (USFWS Project Code 2026-0023591), to ensure compliance with Chapter 12, 64, and 67 of the Texas Parks and Wildlife Code, and the Endangered Species Act of 1973, as amended, the Migratory Bird Treaty Act, and applicable federal regulations pertaining to protected species, the following measures will be implemented:
 - Vegetation clearing must be excluded during the general bird nesting season and tricolored bat (*Perimyotis subflavus*) pupping season, March 15 through September 15, to avoid adverse impacts to breeding birds and tricolored bats. If vegetation clearing during this time is unavoidable, the area proposed for disturbance will be surveyed by a qualified biologist to identify occupied nests and pupping habitat, not more than five days prior to clearing activities. If occupied nests or bat roosts or hibernacula are observed during surveys, a vegetation buffer area of no less than 100 feet in diameter will remain around the nest or roost 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.
 - Vegetation clearing and/or construction will not occur within 660 feet in diameter of a bald eagle nest. If occupied nests are observed during at any time, a vegetation buffer area of no less than 660 feet in diameter will remain around the nest until all young have fledged.

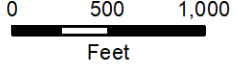
Standard Environmental Conditions

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



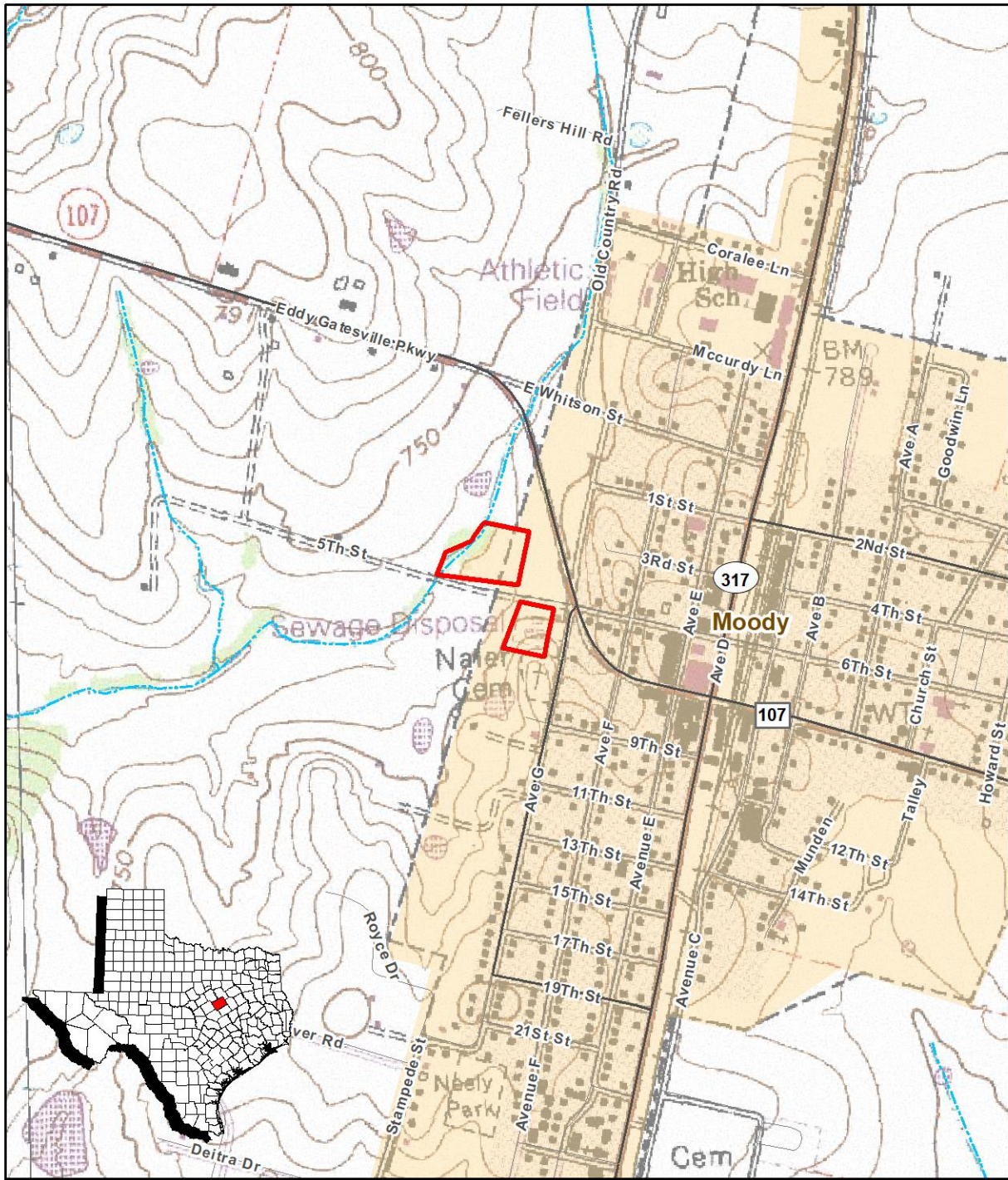
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Base Map: ESRI-USA Base Map

Figure A-1
Project Location on County Base
City of Moody
Wastewater Treatment Plant
McLennan County, Texas

 Project Site



 Project Site



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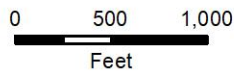
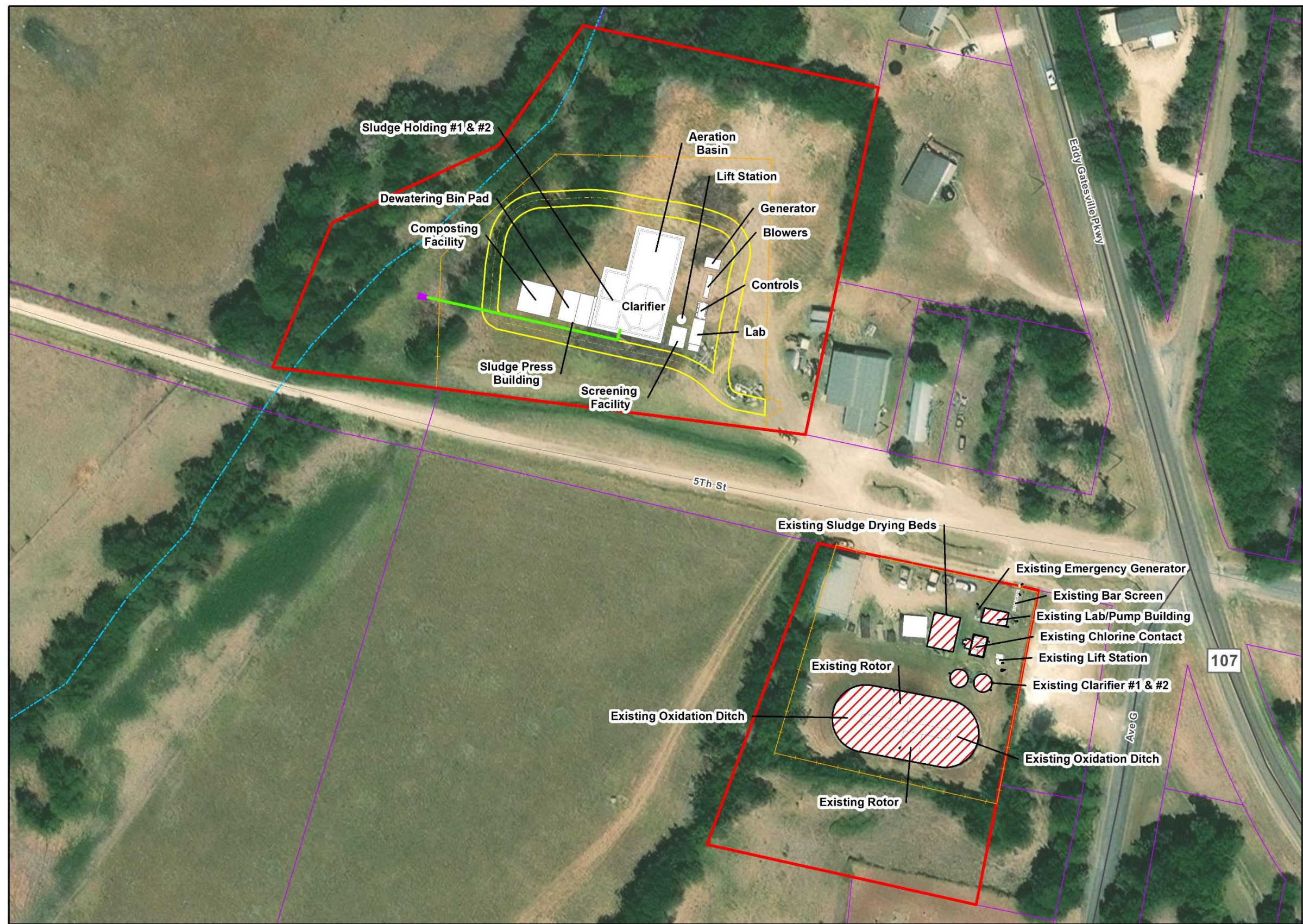


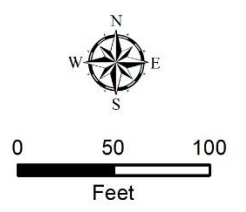
Figure A-2
 Project Location on
 USGS Topographic Map
 City of Moody
 Wastewater Treatment Plant
 McLennan County, Texas

Base Map: 7.5' USGS Topographic Quadrangles:
 Moody, Texas (1965, Revised 1993, Map ID 31097-C3)
 Eagle Springs, Texas (1965, Revised 1993, Map ID 31097-C4)

Figure A-3
 Project Plans
 City of Moody
 Wastewater Treatment Plant
 McLennan County, Texas



- Project Site
- Facilities
- Planned Perimeter Fence
- Planned Access Road
- Parcel Boundary
- Proposed Outfall Location
- Proposed Riprap Apron
- Planned Demolition
- Stream/River (NHD [USGS])



Base Map: ESRI World Imagery 2022

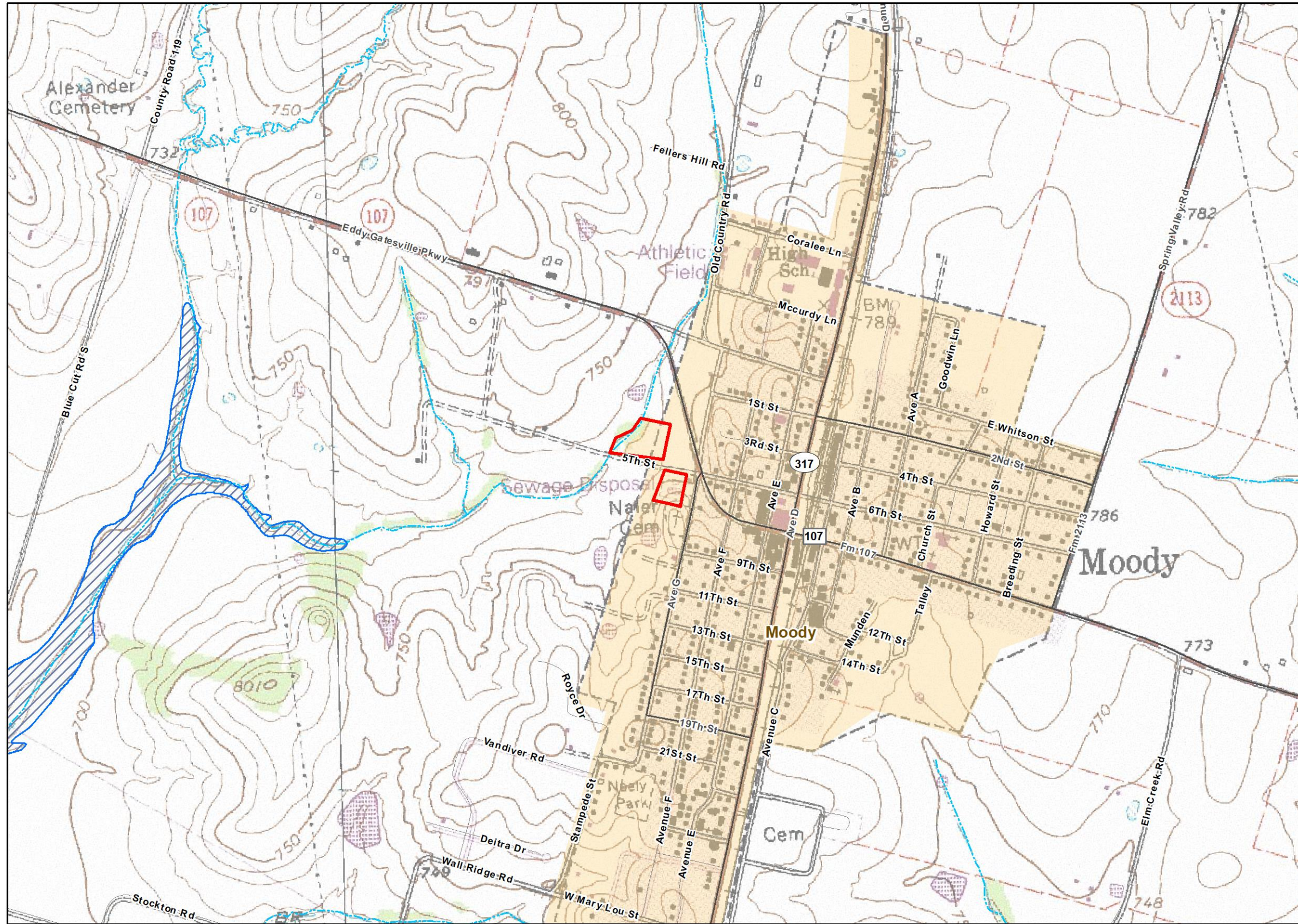
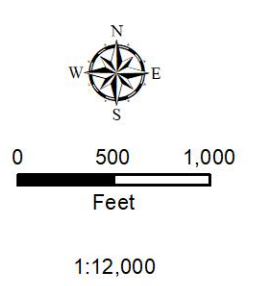


Figure A-5
 FEMA Floodplain Map
 City of Moody
 Wastewater Treatment Plant
 McLennan County, Texas

- Project Site
- 100-year Floodplain (NFHL [FEMA])



Base Map: 7.5' USGS Topographic Quadrangles:
 Moody, Texas (1965, Revised 1993, Map ID 31097-C3)

