

City of Waelder Eight Step Process

Step 1: Determine whether the action is in a 100 Year floodplain or wetland.

This project activities are in 100-year floodplain and no wetlands were identified. The proposed activities at the sewer plant location uses lagoons for wastewater treatment. The proposed improvements consist of installation of backup generators that will be placed above the 100-year flood plain for the purpose of keeping the sewer plant operational during storm events.

The drainage improvements that are taking place citywide are designed to facilitate drainage flows into existing natural drainage creeks. These proposed improvements are taking place along existing road right-of-way and will utilize the existing road drainage patterns to convey the drainage into the existing drainage basins. The proposed road improvements consist of enlarging, reshaping, and regrade of existing ditches located at either the west or east end of the community. (See City of Waelder flood plain depicting project activities located in the 100 Year Flood Plain. Also, attached is the U.S. Fish and Wildlife Service map depicting potential wetlands and/or no wetland locations.)

According to the U.S. Fish and Wildlife Service there are no identifiable wetlands that meet the definition of wetlands. Nevertheless, for this analysis, it was assumed that there is a potential for undiscovered wetlands that could function as a place of refuge for flora and fauna, species and habitat diversity, and stability, and fish and wildlife. The man-made ponds that exist at the City sewer plant were designed to treat the community's wastewater before discharge into the existing drainage patterns. The existing manmade pond located in the northeast sector of the community is a manmade pond that was developed for agricultural purposes and will not be impacted by the proposed improvements.

Step 2: Notify the public for early review of the proposal and involve the affected and interested public in the decision-making process

A public notice describing the project is published in the Gonzales Newspaper (Gonzales Inquirer), the only local newspaper in the community of Waelder, on September 16, 2021. The public notice notified everyone in the community, including any residents in the floodplain. The notice is also sent by mail to all interested, State, local agencies, and non-profit groups that may have an interest in the community. A list of specific agencies and individuals and a copy of the published notification is kept in the project's environmental review record and attached to this document. A copy of this notice is placed in the community's library. The required 15 days are allowed for public comment. As required by regulations, the public notice included the name, proposed location and description of activity, total number of floodplain and wetland acres involved, and the responsible entity contact (City of Waelder, Office of the Mayor) as well as website and location and hours of the office at which a full description of the proposed action can be viewed. Notice is sent to all interested parties concerning mitigation requirements of the Nation Flood Insurance Program (NFIP) as well as consulting local ordinances that must be implemented as part of the NFIP.

A copy of the notices is sent to the following parties:

- U.S. Department of Housing and Urban Development
- U.S Environmental Protection Agency, Region VI

- Golden Crescent Council of Governments
- Texas Historical Commission
- U.S. Fish and Wildlife Services.
- Texas Commission on Environmental Quality
- Texas Department of Transportation
- Tonkawa Tribe of Indians of Oklahoma
- Wichita and Affiliated Tribes
- Coushatta Tribe of Louisiana
- Apache Tribe of Oklahoma
- Comanche Nation of Oklahoma

Step 3: Identify and evaluate practicable alternatives.

The City of Waelder required site selection criteria for the project are based on the following:

- The City of Waelder has only one sewer treatment plant and the improvements are designed to mitigate the effects of future flooding conditions.
- The wastewater improvements are only viable at the City's sewer plant location because that is the only place where the proposed improvements can take place.
- The proposed drainage improvements are located along existing road right-of-way and will utilize the existing road drainage patterns to convey the drainage into the existing drainage basins. The proposed road improvements consist of enlarging, reshaping, and regrade of existing ditches located at either the west or east end of the community.
- The proposed drainage improvements are designed to mitigate the drainage problems during flooding conditions.
- There are no other locations where the proposed drainage improvements can most effectively manage the flood conditions that occur during major storm events.

The City of Waelder considered these conditions, proposed sites, and actions to evaluate practicable alternatives to arrive at the following:

- A. Located the proposed wastewater improvements at another location in the community.

This alternative is not practicable because of the site limitation that requires wastewater treatment flows to gravity flow to the lowest point. Constructing a new wastewater treatment plant is cost prohibitive at the present time. Also, it would take 3-5 years to permit a new wastewater treatment plant that would by practical operational necessity occupy a location that would most likely have to be located near or in a floodplain.

- B. Locate the proposed drainage improvements at another location in the community.

The proposed drainage improvements are located along existing road right-of-way and will utilize the existing road drainage patterns to convey the drainage into the existing drainage basins. At the present time because of the lack of unified drainage system, there are instances where there are no drainage flows during major storm events which results in households being flooded. Considering other locations for the improvements are not practical because drainage flows by design must flow from the highest to the lowest point in the community. The only two low points in the community which are part of the

Baldrige Creek system are located on the east end and west end of the community. The most practicable alternative to facilitate drainage flows is to channel drainage flows into the community's existing drainage basins (Baldrige Creek) that are located on the east and west end of the community.

C. No Action or Alternative Actions that Serve the Same Purpose

A no action alternative was considered and rejected because the wastewater treatment plant improvements will be placed above the 100-year flood plain.

There are no practicable alternatives to relocating the proposed improvements scheduled for the wastewater treatment location because the proposed generators are needed to avert an environmental disaster in the event power is lost at the sewer plant for any appreciable period. Changing locations is not feasible because there is only one sewer plant in the community of Waelder. The proposed improvements will be located above the 100-year floodplain. Relocating the sewer plant is not a feasible alternative because of the cost and time involved in considering such an action. Also, a new location for a wastewater treatment plant would require a proximity to the floodplain which depending on the location may have a greater negative environmental impact than the present location.

There are no practicable alternatives to relocating the drainage improvements taking place along the existing road right-of-way. To resolve the problem while having the least impact on the 100-year flood plain or wetland is to simply utilize the existing road drainage patterns to convey the drainage into the existing Baldrige Creek drainage basins. In this manner, the drainage improvements are restricted to the existing road right-of-way while maintaining the least impact on the natural environment.

Step 4: Identify Potential Direct and Indirect Impacts Associated with Floodplain or Wetland Development

Direct Impacts of the 100 Year flood plain/wetland: The direct impacts on the 100 Year flood/wetland plain consist of facilitating storm flows into its proper drainage channel to reduce the direct adverse impacts to lives and property. No increase in flows is projected beyond the occurrence of the storm event on natural and beneficial floodplain values. No wetlands were identified along the normally dry Baldrige Creek.

Indirect impacts of the 100 Year flood plain/wetland: The indirect impacts on the 100 Year floodplain/wetlands on adverse impacts to lives and property may see some natural moderation of floods, some increase in water quality maintenance, and ground water recharge. Existing drainage coefficients will remain the same. Some localized flooding impediments will be removed.

Step 5: Where practicable, design or modify the proposed action to minimize the potential adverse impacts to lives, property, and natural values within the floodplain and to restore, and preserve the values of the floodplain/wetland.

- A. Preserving Lives: In an effort to preserve lives during a major storm and to avert an environmental disaster in the event power is lost at the sewer plant for any appreciable period generators keep the wastewater treatment plan functional. Contamination of the community's water supply is a major health and safety factor for this reason it is necessary to keep the wastewater treatment plan functional. The proposed drainage improvements located along the road right-of-way utilize the existing road drainage patterns to convey the drainage into the

Baldrige Creek drainage basins. At the present time there are instances where no drainage flows during major storm events results in households being flooded. In this manner, the proposed drainage improvements will potentially save lives.

- B. Preserving Property: To preserve property, the proposed wastewater treatment plant improvements mitigate the possibility that local property could be inundated by wastewater resulting in a health and safety risk. The drainage improvements preserve property from being inundated by rising flood waters that do not drain because of the lack of a viable drainage pattern.
- C. Preserving Natural Values and Minimizing Impacts: The proposed improvements at the wastewater water treatment plant are elevated above the 100-hundred-year flood plain minimizing the impact on the floodplain. Any role that the wastewater treatment plant provides in preserving natural values will continue with little to no change. The proposed drainage improvements will be confined to the existing road right-of-way and utilize the existing drainage patterns to convey the drainage into the existing drainage basins. The road improvement consists of enlarging, reshaping, and regrading of existing ditches located at the west or east end of the community.

Step 6: Reevaluate the Alternatives

The wastewater treatment plant location is in the 100-year floodplain. The plant lagoons are located above the 100 Year flood plain. The proposed improvements at the sewer plant will be elevated above the 100-year floodplain.

Flood plain evaluation: The majority of the improvements taking place in the community are located outside of the flood plain. Approximately, 5.9 acres of the drainage improvements will be in the flood plain along established public rights-of-way that have been previously disturbed. The total project acreages of public improvements are 6.18 acres for the entire project. This means approximately 95 percent of the improvements will be confined to previously disturbed locations along public right-of-way. The proposed improvements at the sewer plant location consist of installation of a sewer plant generator along with 6 LS transfer switches occupying a total area of approximately .06 acres. The proposed improvements will be elevated above the 100-year flood plain.

Wetland evaluation: The sewer plant ponds/lagoons could potentially be used as wetland refuge for some species of wildlife. Any flora and fauna that may exist would be short-lived because of the ongoing operations of the sewer plant using aerators and other mechanical devices that are designed to treat the wastewater.

Step 7: Reevaluate the proposed action to determine whether action is still practicable

Project activities are practicable since the majority (95%) of the proposed improvements are taking place on public right-of-way that was previously disturbed by road construction. The proposed improvements are designed to facilitate drainage flows into existing drainage basins that are in a 100-year flood plain. The proposed improvements at the sewer plant consist of installation of sewer plant generator that is designed to keep the plant operating during critical storm events to avoid sewage spills which could potentially adversely impact human life and property. The positive impacts of the proposed

improvement on the human environment outweigh any potential negative impact. No practicable alternatives can be identified to locating in the proposed activity in the 100-year flood plain or the wetland.

Step 8: Implement the Proposed Action. Reevaluation results in a determination that there is no practicable alternative to locating in the proposed activity in the 100-year flood plain or the wetland.

Reevaluation of project activities results in determination that there is no practicable alternative to locating the proposed activities in other than the locations proposed in project summary. The City of Waelder will take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risk are taken.