

EDWARD F. POOLOS
DIRECTOR

JEFFERY W. KITCHENS
DEPUTY DIRECTOR



Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

KAY IVEY
GOVERNOR

CATEGORICAL EXCLUSION FROM ENVIRONMENTAL REVIEW

Arab Water Works Board
Blount, Cullman, Marshall, Morgan Counties

SRF Project No. FS010259-01

August 27, 2025

The Alabama Department of Environmental Management has made **\$3,854,000** in financial assistance available to the **Arab Water Works Board** utilizing funds from the FY 2019 Drinking Water State Revolving Fund program (**DWSRF**). In accordance with State and Federal regulations that govern the program, the Alabama Department of Environmental Management has conducted a review to assess the potential impacts upon the environment that may result from implementation of this project.

The Arab Water Works Board proposes additional improvements to its drinking water treatment and distribution systems. The proposed project consists of the system-wide installation of Advanced Metering Infrastructure (AMI) water meters and remote monitoring equipment, replacing all existing problematic standard water meters. High efficiency pumps and controls will also be installed at the Water Treatment Plant (WTP) to upgrade the backwash system. Completion of these improvements will decrease the amount of undetected water loss for increased energy cost savings and will provide more accurate customer billing. Utilization of high efficiency pumps and controls in the treatment process will result in additional energy cost savings as well as increase overall system efficiency.

The Alabama Department of Environmental Management has determined that the project qualifies for a Categorical Exclusion (CE) from further environmental study under the guidelines specified by the State Environmental Review Process (SERP) which specifically include actions which are solely directed toward minor rehabilitation of existing facilities, functional replacement of equipment, or towards the construction of new ancillary facilities adjacent or appurtenant to existing facilities. However, this decision may be reconsidered if significant adverse information concerning the potential environmental impacts of the project is discovered.

Comments related to this project should be submitted in writing to Mrs. Kelly M. Bibb, SRF Section, Permits and Services Division, Alabama Department of Environmental Management, Post Office Box 301463, Montgomery, Alabama 36130-1463, no later than 30 days after the date of this public notice. The Alabama Department of Environmental Management will not take formal action to proceed with the project without carefully evaluating any public comments opposing the project.

Sincerely,

Edward F. Poolos
Director

EFP/MDM/KMB/kmb
Attachment



Birmingham Office
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Office
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Coastal Office
1615 South Broad Street
Mobile, AL 36605
(251) 450-3400
(251) 479-2593 (FAX)

The Categorical Exclusion is promulgated in the State Environmental Review Process (SERP) in Part IV, Section C: Categorical Exclusions for Drinking Water State Revolving Fund Projects: (Italicized sections apply.)

1. The following drinking water projects are eligible for categorical exclusions:
 - a. *Actions intended solely for minor rehabilitation, functional replacement, or ancillary facilities adjacent or appurtenant to existing facilities.*
 - b. Minor construction, including:
 - (1) New wells or replacement wells for water supply purposes if ancillary to the existing system;
 - (2) Improvements not intended to increase capacity of the system;
 - (3) Facilities for the disinfection of public water supplies;
 - (4) Facilities such as looping that will result solely in the provision of adequate public water system pressure;
 - (5) Construction of water tanks;
 - (6) Construction of new water lines in previously disturbed areas within one mile of the existing distribution system.
 - c. Projects where funding is being provided for planning and/or engineering costs only (in which case the requirements of IV.C.1.a-d do not apply).
2. In order to determine if a drinking water project is eligible for a CE, all of the following must not apply:
 - a. The action is known or expected to directly or indirectly adversely impact any of the following:
 - (1) Cultural or historical resources;
 - (2) Endangered or Threatened Species and/or their critical habitats;
 - (3) Environmentally important natural resource areas such as floodplains, wetlands, prime agricultural land, or aquifer recharge zones.
 - b. The action is not cost effective.
 - c. The action will cause significant public controversy.
 - d. The action will create a new or expanded surface drinking water source.

This project complies with the above requirements and has been determined to be eligible for a Categorical Exclusion.



ALABAMA HISTORICAL COMMISSION

468 South Perry Street
Montgomery, Alabama 36130-0900

Lisa D. Jones
Executive Director
State Historic Preservation Officer

Tel: 334-242-3184
Fax: 334-242-1083

August 2, 2024

Sherri Groghan
Goodwyn Mills Cawood
2400 5th Avenue South Suite 200
Birmingham, AL 35233



Re: AHC 24-0369
The Arab Water Works Board Water System Improvements
Marshall, Morgan, Cullman and Blount Counties

Dear Ms. Groghan:

Upon review of the above referenced project, we concur that project activities will have no effect on cultural resources eligible for or listed on the National Register of Historic Places. Therefore, we concur with the determination of no effect to historic properties.

Consultation with the State Historic Preservation Office does not constitute consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public. If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal, and glass objects. The federal agency or the applicant receiving federal assistance should contact our office immediately. If human remains are encountered, the provisions of the Alabama Burial Act (*Code of Alabama* 1975, §13A-7-23.1, as amended; Alabama Historical Commission Administrative Code Chapter 460-X-10 Burials) should be followed. This stipulation shall be placed on the construction plans to ensure contractors are aware of it.

We appreciate your commitment to helping us preserve Alabama's historic archaeological and architectural resources. Should you have any questions, please contact Eric Sipes at 334.230.2667 or Eric.Sipes@ahc.alabama.gov. Have the AHC tracking number referenced above available and include it with any future correspondence.

Sincerely,

Lee Anne Hewett
Deputy State Historic Preservation Officer

LAH/EDS/lah



DEPARTMENT OF THE ARMY
NASHVILLE DISTRICT, CORPS OF ENGINEERS
REGULATORY DIVISION
3701 BELL ROAD
NASHVILLE, TENNESSEE 37214

August 23, 2024

SUBJECT: File No.LRN-0-4074500, Arab Water Works Board, Concurrent for Proposed Meter Change, Arab Waterworks, Marshall County, Alabama -86.3533°W)



City of Arab Water Supply Board
406 Cullman Road
Arab, AL 35016-1359

Dear Applicant:

This is in response to your July 31, 2024, request for our comments regarding the subject project. The U.S. Army Corps of Engineers (USACE) has regulatory responsibilities pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403) and Section 404 of the Clean Water Act (33 U.S.C. 1344). Under Section 10, the USACE regulates all work in, or affecting, navigable waters of the U.S. Under Section 404, the USACE regulates the discharge of dredged and/or fill material into waters of the U.S. (33 CFR Part 328).

A review of the information provided indicates the subject activity would not involve a discharge of dredged or fill material, or work affecting navigable water¹; therefore, a Department of the Army permit would not be required.

We understand the project proposal may not have specific design plans at this time, and this inquiry is an initial review to obtain grant funds. We have no objections to the applicant receiving grant funds for the proposal.

If you have questions regarding this matter, please contact me at the above address or telephone (256) 350-5620. Thank you for the opportunity to review and comment on this proposed project.

Sincerely,

Thomas Giordano
Regulatory Specialist, West Branch
Regulatory Division
U.S. Army Corps of Engineers

¹ <https://www.lrn.usace.army.mil/Missions/Regulatory/Navigable-Waters-List>



Goodwyn Mills Cawood

2400 5th Avenue South
Suite 200
Birmingham, AL 35233

T (205) 879-4462

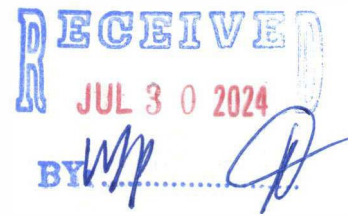
www.gmcnetwork.com

July 30, 2024

Mr. Bill Pearson
Field Supervisor
U.S. Fish and Wildlife Service
1208-B Main Street
Daphne, AL 36526

**RE: The Arab Water Works Board – Water System Improvements
2024 EID (2) DWSRF The Arab Water Works Board
Marshall, Morgan, Cullman & Blount Counties, Alabama
USACE No Permit Required Request
Project Code: 2024-0030613**

AD
JK



Dear Mr. Pearson:

This letter is to notify this agency of new details to the 2024 Arab DWSRF project. The previous amendment to the 2019 EID, emailed on January 11, 2024, was for the funding for the purchase of the new Automated Meter Reading (AMR) residential water meters. New additional information is being requested to be included in the updated 2024 EID (2) for the installation of the new water meters. Although the installation is not a part of the 2024 EID (2) funds, we are seeking coordination with your office as required by ADEM.

The Arab Water Works Board has an existing 2019 DWSRF EID approval for the repainting/rehabilitation of six (6) water tanks and interior upgrades to the existing Water Treatment Plant located in Marshall and Morgan Counties. All of the existing water tanks and Water Treatment Plant for the Arab Water Works Board are located in Marshall County with the exception of Union Hill Water Tank which is located in Morgan County. The entire service area for the Arab Water Works Board includes Marshall, Morgan, Cullman and Blount Counties.

Addendum:

New additional information is being requested to be included in the updated 2024 EID (2) although not a part of the 2024 EID (2) funds. This new additional information is for the installation of the new water meters completed by local forces. The new water meters will be installed exactly where the old meters are located. There will be no ground disturbance during this project.

Previously Reviewed Project Components:

The purpose of the proposed project is to utilize the remaining funding from the existing 2019 DWSRF EID project to purchase 5,000 new residential radio read water meters to replace existing old, inefficient and problematic standard water meters, as well as the addition of high efficiency pumps and controls for the Water Treatment Plant backwash system. Improvements to the Water Treatment Plant will be within the foot print of the existing infrastructure. The Automated Meter Reading (AMR) water meters will reduce operations and maintenance cost for the system, help reduce system water losses and increase efficiency. There will be no ground disturbance during this project. Please refer to the attached maps to view the Water Treatment Plant project location and Arab Water Works Board area of service. The Water Treatment Plant is located at 66 Water Works Road, Guntersville, AL. Coordinates for the Water Treatment Plant: 34.36194N, 86.35254W.



According to the U.S. Fish & Wildlife Service (USFWS) Environmental Conservation Online System (ECOS), accessed December 27, 2023, and updated species list on July 24, 2024, the endangered and threatened species listed within the project area for Marshall County, Alabama include:

Group	Common Name	Scientific Name	Status
Mammals	Indiana Bat	<i>Myotis sodalis</i>	Endangered
Mammals	Northern Long-eared Bat	<i>Myotis septentrionalis</i>	Endangered
Mammals	Tricolored Bat	<i>Perimyotis subflavus</i>	Proposed Endangered
Mammals	Gray Bat	<i>Myotis grisescens</i>	Endangered
Birds	Whooping Crane	<i>Grus americana</i>	Experimental Population Non-Essential
Insects	Monarch Butterfly	<i>Danaus plexippus</i>	Candidate

There are no critical habitats at this location.

Indiana Bat (*Myotis sodalis*)

Indiana bats hibernate in caves during winter or, occasionally, in abandoned mines. For hibernation, they require cool, humid caves with stable temperatures, under 50° F, but above freezing. Very few caves within the range of the species have these conditions. Indiana bats use trees as roosting and foraging sites during summer months. There were no caves or abandoned mines noted within the project area. Maternity sites generally are behind loose bark of dead or dying trees or in hollow trees. Large, dead trees are preferred roost sites. Indiana bats are found over most of the eastern half of the United States. The proposed project is within the foot print of existing maintained infrastructure and does not contain suitable habitat for the Indiana bat.

Northern Long-eared Bat (*Myotis septentrionalis*)

Northern long-eared bats spend winter hibernating in caves and mines. They use areas in various sized caves or mines with constant temperatures, high humidity, and no air currents. During the summer, northern long-eared bats roost singly or in colonies underneath bark, in cavities or in crevices of both live trees and snags. The northern long-eared bat's range includes much of the eastern and north central United States (37 States and the District of Columbia), and all Canadian provinces from the Atlantic Ocean west to the southern Yukon Territory and eastern British Columbia. USFWS defines suitable NLEB roost tree as any tree ≥3 inches in diameter (at breast height) with cracks, crevices, exfoliating bark, and/or cavities/hollows that is within 1,000 feet of forested/wooded habitat. The proposed project is within the foot print of existing maintained infrastructure and does not contain suitable habitat for the Northern Long-eared bat.

Tri-colored Bat (*Perimyotis subflavus*)

The tri-colored bat (*Perimyotis subflavus*) is one of the smallest bats native to North America ranging across the eastern and central United States and portions of southern Canada, Mexico and Central America. During the winter, tricolored bats are found in caves and mines, although in the southern United States, where caves are sparse, tricolored bats are often found roosting in road-associated culverts. During the spring, summer and fall, tricolored bats are found in forested habitats where they roost in trees, primarily among leaves. Currently, the tri-colored bat has been proposed for listing as endangered under the Endangered Species Act. It is possible that this bat could be officially listed as endangered in the near future. However, because it is currently not listed, this species is not regulated under the Endangered Species Act. There were no caves or abandoned mines noted within the project area. The proposed project is within the foot print of existing maintained infrastructure and does not contain suitable habitat for the Tri-colored Bat.



Gray Bat (*Myotis grisescens*)

The Gray bat is a medium sized bat with long, glossy fur light brown to brown in color, ears dark and black the length and longer than any other genus of myotis of the gray bat is about 3.5 inches with a wingspan of 10 to 11 inches. They feed upon flying insects and is mostly adapted to forest foraging. The gray bat habitat is typically limestone karst areas such as: caves, sinkholes, and springs as well as dams, mine, quarries, concrete box culverts and undersides of bridges. They have a limited geographic range of the southeastern united states. Winter hibernation occurs in caves across northern Alabama, Arkansas, Kentucky, Missouri, and Tennessee. The summer range extends from eastern Oklahoma, southeastern Kansas, across southern Illinois and Indiana out to south western Virginia, western North Carolina and northwest section of Georgia. There were no caves or abandoned mines noted within the project area. The proposed project is within the foot print of existing maintained infrastructure and does not contain suitable habitat for the Gray Bat.

Whooping Crane (*Grus americana*)

The whooping crane occurs in North America only and is the tallest bird in North America with males approaching 5 feet when standing erect. The adult plumage is white except for black primaries, black or gray alula, black bristly feathers on the crown and malar region and a dark gray-black patch on the nape. Winters and forages in wetlands, coastal marshes, estuaries, inland marshes, lakes, ponds, wet meadows, rivers and agricultural fields. Nest sites are typically located in shallow diatom ponds that contain bulrush but will also nest in cattail, sedge, and musk-grass. The proposed project is within the foot print of existing maintained infrastructure and does not contain suitable habitat for the Whooping Crane.

Monarch Butterfly (*Danaus plexippus*)

The adult Monarch Butterfly is a large butterfly with bright orange wings surrounded by a black border and covered with black veins. Monarchs lay eggs on their obligate milkweed host plant and larvae emerge after two to five days. The milkweed plant prefers full sunlight and grows best in opens areas with well drained soils. Larvae develop through five larval stages before pupating into a chrysalis and emerging 6 to 14 days later into an adult butterfly. Monarchs in temperate climates, such as eastern and western North America, undergo long-distance migration. This migration can take monarchs distances of over 3,000 km and last for over two months. In early spring, monarchs' mate at the overwintering sites before they begin the flight north. This species lay their eggs on their obligate milkweed host plant. The milkweed plant prefers habitats with full sunlight and grows in fields, meadows, and along roadsides.

The installation of the new water meters will not be a part of the 2024 EID (2) funds and will be completed by local forces. The new water meters will be installed exactly where the old meters are located. There will be no ground disturbance during this project, therefore, it is GMC's opinion that all project components are considered maintenance of the existing infrastructure.

We would appreciate a response as soon as possible. If you need any further information or wish to discuss this project, please let us know. To help expedite the review process, your response can be e-mailed to sherri.groghan@gmcnetwork.com.

Sincerely,
GOODWYN MILLS CAWOOD, LLC



Sherri Groghan
Environmental Scientist



U.S. Fish and Wildlife Service
1208-B – Daphne, Alabama 36526
Phone: 251-441-5181 Fax: 251-441-6222

No endangered or threatened species or critical habitat are known to occur in the project area. As described, the project will have no significant impact on fish and wildlife resources. IF PROJECT DESIGN CHANGES ARE MADE, PLEASE SUBMIT NEW PLANS FOR REVIEW.


William J. Pearson

William J. Pearson, Field Supervisor
Alabama Ecological Services Field Office

SEP 26 2024

Date

2

August 6, 2024

Goodwin Mills Cawood, LLC
ATTN: Sherri Groghan, Environmental Scientist
2400 5th Avenue South, Suite 200
Birmingham, AL 35233



**RE: The Arab Water Works Board – Water System Improvements
2024 EID (2) DWSRF The Arab Water Works Board
Marshall, Morgan, Cullman & Blount Counties, Alabama**

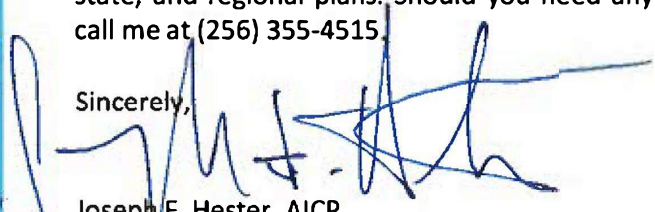
Dear Ms. Groghan:

The North Central Alabama Regional Council of Governments (NARCOG) has reviewed the new details and maps supplied for the project referenced above, and we offer our concurrence for this project. NARCOG understands that the applicant is applying for Drinking Water State Revolving Funds (DWSRF) through the Alabama Department of Environmental Management (ADEM) for the purpose of completing improvements and that the previous amendment to the 2019 EID, emailed on January 11, 2024, was for the funding for the purchase of the new Automated Meter Reading (AMR) residential water meters. Additionally, new additional information is being requested to be included in the updated 2024 EID (2) although it's not a part of the 2024 EID (2) funds. The proposed project will address needed water system improvements by completing the following:

- Installation of the new water meters to be completed by local forces. The new water meters will be installed exactly where the old meters are located. There will be no ground disturbance during this project.

In conclusion, NARCOG finds the proposed project to be consistent and compatible with local, state, and regional plans. Should you need any further assistance, please do not hesitate to call me at (256) 355-4515.

Sincerely,



Joseph F. Hester, AICP
Director of Planning and Development

cc: Robby Cantrell, Executive Director
File



August 28, 2024

Sherri Groghan - Environmental Scientist
GMC
2400 5th Avenue South
Birmingham, Alabama 35203



Dear Ms. Groghan:

Re: Arab Water Works Board – Water System Improvements; Marshall, Morgan, Cullman & Blount Counties, Alabama

This letter is in response to your letter requesting our review on the subject project. The Regional Planning Commission of Greater Birmingham (RPCGB) does not know of any reason to oppose, and therefore concurs with the project. Thank you for giving us the opportunity to comment.

Sincerely,

Charles E. Ball, AICP
Executive Director

Michelle Gilliam Jordan, FAICP | Executive Director

08/01/24

Ted Hyatt, Manager
Arab Water Board
526 Cullman Road
Arab, AL 35016**CLEARINGHOUSE MEMO**

RE: Marshall County: *City of Arab, Waterworks Board:* NEPA Environmental review (EID/ERR) for an ADEM DWSRF program Application to: Provide funds to replace 5,000 old, outdated, standard water meters, with automated/radio read meters; and other upgrade/additions to Arab's Water Treatment Plant. **Addendum** to 03/24 initial project review and concurrence, to add Utility's installation of the Grant fund acquired meters.

The Clearinghouse of the Top of Alabama Regional Council of Governments' Board of Directors, in accordance with Executive Order 12372 and State Executive Order Eight, reviewed the above-referenced Action.

Per the submitted and review materials, the proposed meter upgrade/replacement installations will all occur in/on Utility property at existing meter locations, which are on previously environmentally disturbed and documented ROW/easement areas. The reviewed EID/ERR submitted materials therefore indicate no environmental issues; and this review assumes that the project's execution will meet all ADEM requirements.

The project is based on a well-prepared, professional engineering analysis, and this review assumes its stated project review facts. The installation of the new meters is an obviously necessary step to allow their use; which will reduce system operations and maintenance costs, help reduce system water losses, and increase efficiency. The Project will following all associated ADEM and Federal Guidelines, and Construction Best Management Practices (CBMP's) will be required to be maintained by the contractor and will be included in the Construction Contract Documents.

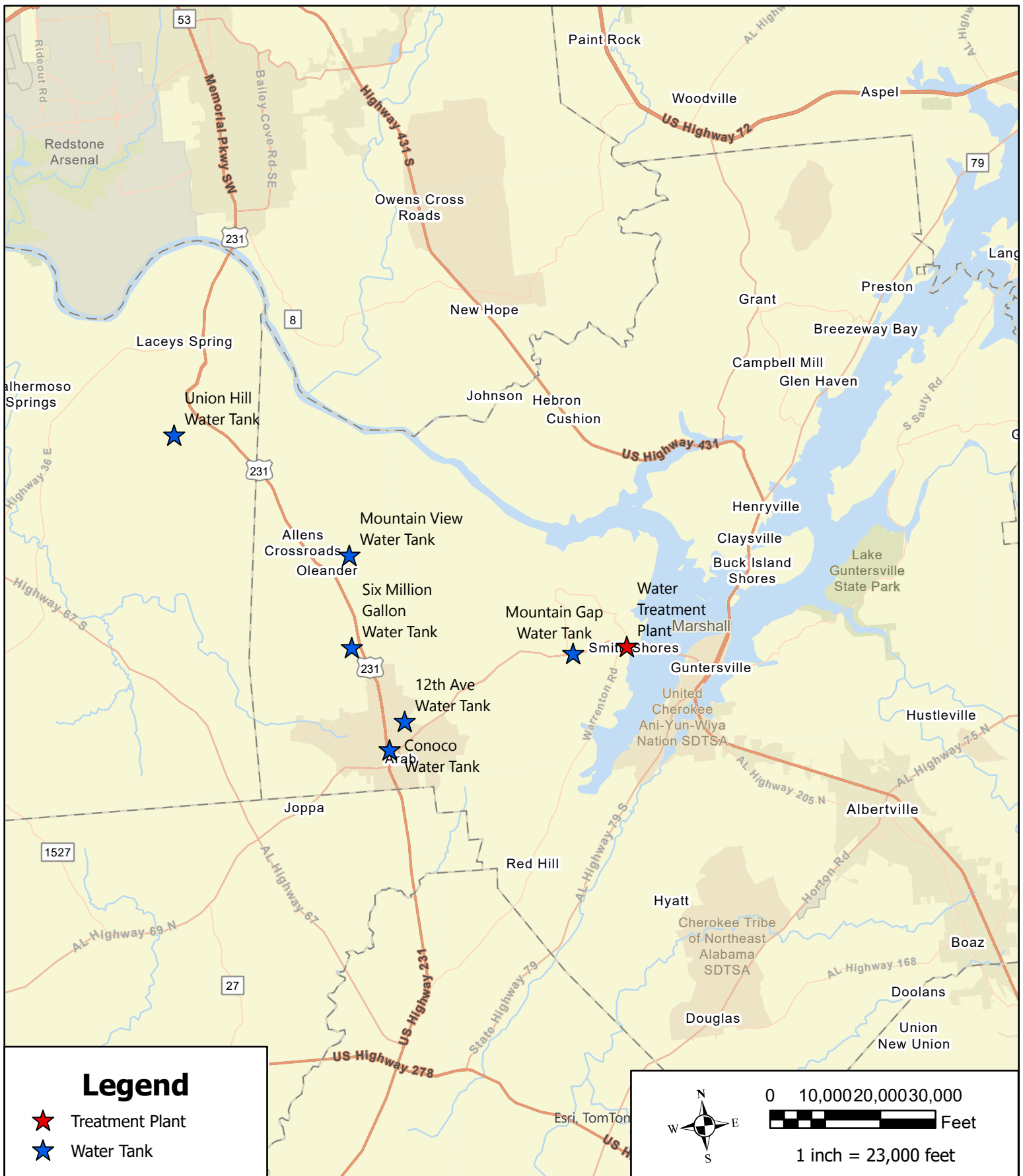
This project is consistent with the Waterworks Board's long-term goal to provide safe, reliable and efficiently economical water services to its customers, while maintaining compliance with applicable environmental agency regulations. We therefore find this meter installation addendum activity to be in conformance with, and support of, critical service upgrade and efficiency needs recognized in water system utility planning goals and efforts within the TARCOG region, and we concur with, and endorse this Project's meter installation addendum. If we can be of further assistance, please contact us.

Sincerely,

D. C. Schafer

Area-wide Clearinghouse

Cc: Sherri Groghan, Environmental Scientist, GMC
sherri.groghan@gmcnetwork.com .



REF. SHEET: ESRI STREETS
DESCRIPTION: EID

Arab, DWSRF

MARSHALL, MORGAN, CULLMAN
BLOUNT COUNTIES, ALABAMA

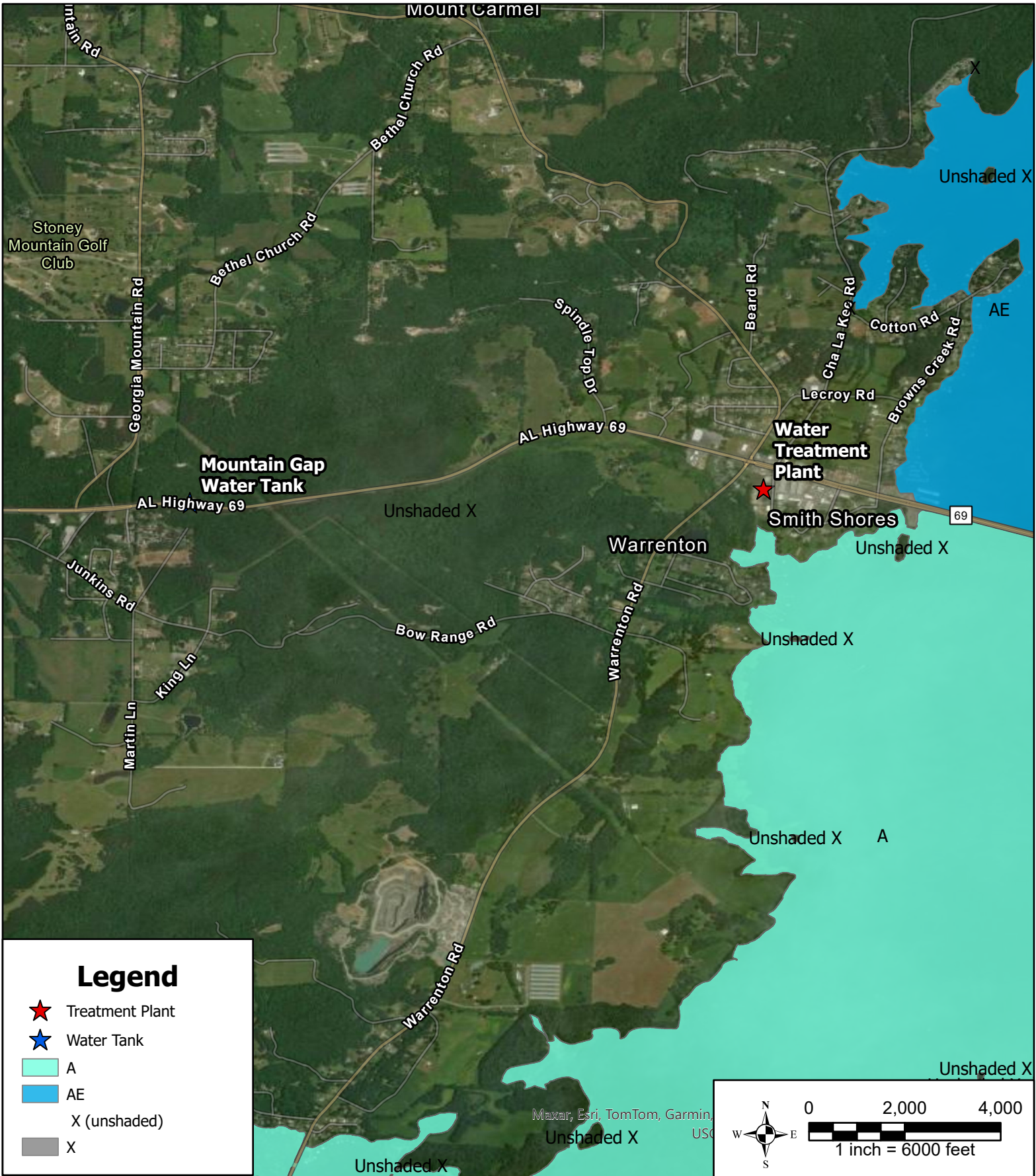
SRF Section
APR 15 2025
Permits & Services
Division

FIGURE 1 GENERAL LOCATION MAP

GMC #EHUN240001
DATE: 1/08/24
DRAWN BY: SAS

117 Jefferson Street North,
Huntsville, AL 35801
T: 256.539.3431
GMCNETWORK.COM

GMC
Goodwyn Mills Cawood



REF. SHEET: FEMA NATIONAL FLOOD HAZARD
DESCRIPTION: EID

Arab, DWSRF

MARSHALL, MORGAN, CULLMAN & CLAY
COUNTIES, ALABAMA

SRF Section
APR 15 2025
Permits & Services
Division

FIGURE 4

FEMA MAP

MOUNTAIN GAP WATER TANK AND TREATMENT PLANT

GMC #EHUN240001

DATE: 1/05/24

DRAWN BY: SAS

117 Jefferson Street North,
Huntsville, AL 35801
T: 256.539.3431
GMCNETWORK.COM

GMC
Goodwyn Mills Cawood