

## CATEGORICAL EXCLUSION FROM ENVIRONMENTAL REVIEW

The Utilities Board of the Town of Citronelle dba South Alabama Utilities  
Mobile and Washington County

SRF Project No. FS010089-09

March 18, 2026

The Alabama Department of Environmental Management has made **\$12,000,000** in financial assistance available to **South Alabama Utilities** using funds from the Drinking Water State Revolving Fund (DWSRF) loan program. In accordance with State and Federal regulations that govern the program, the Alabama Department of Environmental Management has conducted a review to assess potential impacts upon the environment that may result from implementation of this project.

The project includes the replacement of ~16,500 water meters equipped with AMR transmitters (Automated Meter Reading transmitters) with new water meters equipped with AMI transmitters (Advanced Metering Infrastructure). No water treatment/distribution facility itself will be affected. However, implementation of this project will change how the system collects its usage data from the existing drive-by system to the automatic transmission of data directly to the system operations staff and billing software. Not only will this reduce the billing staff workers' load, but it will also create extremely accurate billing information for the customer. Implementation of this project will also reduce the operator's workload of reading meters, and shift focus to tasks such as investigating anomalous usage information, monitoring water usage data, and servicing damages/leaks. This project also includes the construction of a new groundwater supply well, a new water treatment facility, and the installation of approximately 12,000 linear feet of new 12-inch water main along Airport Boulevard. These facilities will support the Airport Boulevard corridor by increasing system supply, improving hydraulic performance, and strengthening SAU's ability to meet peak demand. Work will include site clearing, well construction, installation of treatment equipment for disinfection and polyphosphate feed, construction of a pre-engineered treatment building, installation of electrical and SCADA controls, and water main installation by both open-cut and trenchless methods. All construction will take place within SAU-owned property, existing rights-of-way, or previously disturbed utility corridors.

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 relative to this project should be submitted in writing to Mr. John Laney, SRF Branch, 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 CE. 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.

Edward F. Poolos  
Director

LRL/ADC/JWL/kbh  
Attachment

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.

## **Appendix A: Overview Map of the SAU Service Area for AMI Metering Portion of Project**

Link to full size PDF:

<https://www.dropbox.com/scl/fi/4h454yiakuwrmb6ud9yif/SAU-OVERVIEW-2024-1.pdf?rlkey=bosyalex9hpxccg2nknw7zgyl&st=u1laleh6&dl=0>



## **Appendix B: Overview Map of Flood Zones in the SAU Service Area**

Link to Full Sized PDF:

<https://www.dropbox.com/scl/fi/g487bwqvy9c3nhtk2cagj/SAU-OVERVIEW-2025-24x36-P-W-FEMA-FIRM.pdf?rlkey=omov6fd8xg12wjt67iezzrh3l&st=s8r2wzjx&dl=0>



## **Appendix C: Concurrency Letters from Involved Agencies**

### **AMI Metering**

Figure 4: AHC Concurrency Letter/Correspondence (Pg. 33-35)

Figure 5: Fish & Wildlife Concurrency Letter/Correspondence (Pg. 36-38)

Figure 6: COE “No Permit” Packet/Correspondence (Pg. 39-44)

Figure 7: SARPC Concurrency Letter/Correspondence (Pg. 45-48)



**SPEAKS & ASSOCIATES**  
**CONSULTING ENGINEERS, INC.**  
732 OAK CIRCLE DRIVE WEST  
MOBILE, ALABAMA 36609  
PHONE: (251) 666-4646 FAX: (251) 666-8868

*Mikell D. Speaks, PE/PLS (1941-2022)*  
*William G. Luker, PE/PLS*  
*J. William Parkes, PE*  
*John A. Sprinkle, PE*  
*Jeremy O. Turner, EI*

June 4, 2025

Ms. Amanda McBride, Environmental Review Coordinator  
Alabama Historical Commission  
468 South Perry Street  
Montgomery, Alabama 36104

**Re: South Alabama Utilities - AMI Meter Replacement**

Dear Ms. McBride:

Speaks & Associates is in the process of preparing an Environmental Information Document (EID) for the project referenced above to obtain funding through the Drinking Water State Revolving Fund (DWSRF). This document will be reviewed by the Alabama Department of Environmental Management (ADEM) so that they may assess the environmental impacts of the project. The proposed project consists of removing approximately 16,500 existing water meters, most being AMR (drive-by radio read type) sizes 3/4 x 5/8-inch through 2-inch, with new AMI water meters equipped with electronic end points which transmit meter reading by cell or radio signal directly to a managed electronic collection site where the meter readings are then forwarded directly to the system operations staff and billing software. Additionally, defective curb stops, customer backflow preventers, and meter boxes will be replaced on an as-needed basis as the work progresses. The project will be constructed by a contractor who will be required to provide a quality control program recording the condition of each existing removed meter and each new meter set (including photograph and GPS location). This information will be provided to complete final records for SAU. The contractor will install and activate each meter endpoint and coordinate the transfer of data with the billing system and operator staff. The existing meters and electronic endpoints will be removed, salvaged, and recycled by the meter manufacturer. We have enclosed an overall water system overview map for your use.

We request the assistance of your office in reviewing the information we have provided for compliance with the regulations. Please provide concurrence for the project or recommendations or comments you deem appropriate. This information is vital to the further processing of our funding application. Therefore, we would appreciate a response. Please contact me at 251-666-4646 if you need any additional information or wish to discuss the project further.

Sincerely,

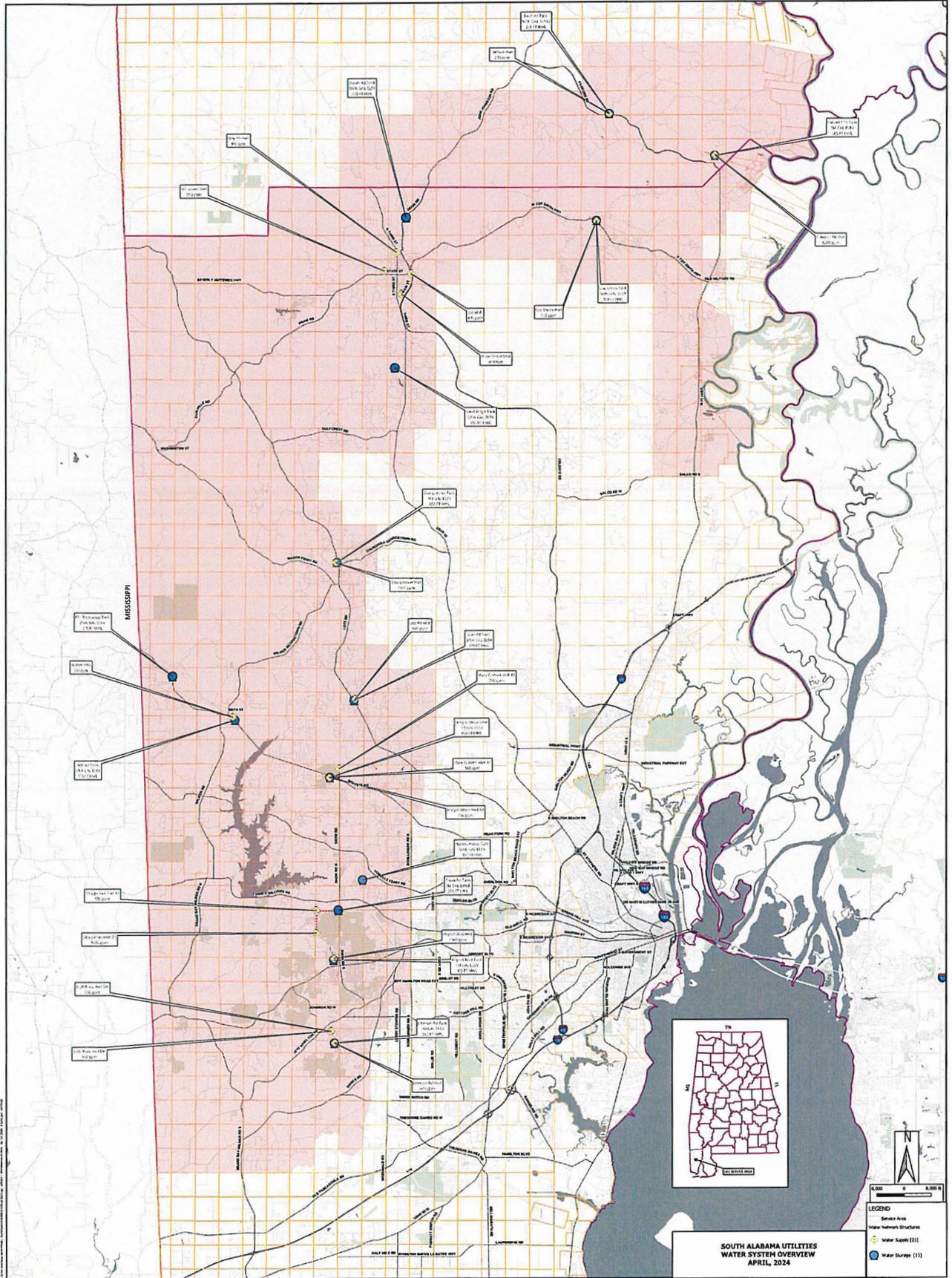
Speaks & Associates  
Consulting Engineers, Inc.

William G. Luker, PE/PLS

WGL/jlm

Enclosures

Cc: John Laney, ADEM  
Marcus Hobbs, Chairman, SAU





# 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

June 12, 2025

Jennifer McIlwain  
732 Oak Circle Dr. W  
Mobile, AL 36609

Re: AHC 25-0852  
South Alabama Utilities - AMI Water Meter Replacement  
Mobile and Washington County

Dear Ms. McIlwain:

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](mailto:Eric.Sipes@ahc.alabama.gov). Have the AHC tracking number referenced above available and include it with any future correspondence.

Sincerely,

A handwritten signature in cursive script that reads "Lee Anne Hewett".

Lee Anne Hewett  
Deputy State Historic Preservation Officer

LAH/EDS/lah



**SPEAKS & ASSOCIATES**  
**CONSULTING ENGINEERS, INC.**  
732 OAK CIRCLE DRIVE WEST  
MOBILE, ALABAMA 36609  
PHONE: (251) 666-4646 FAX: (251) 666-8868

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*William G. Luker, PE/PLS*  
*J. William Parkes, PE*  
*John A. Sprinkle, PE*  
*Jeremy O. Turner, EI*

June 4, 2025

Mr. William Pearson, Field Supervisor  
U. S. Department of the Interior  
Fish and Wildlife Service  
1208 Main Street  
Daphne, Alabama 36526-4419

**Re: South Alabama Utilities – AMI Meter Replacement**

Dear Mr. Pearson,

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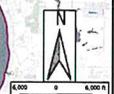
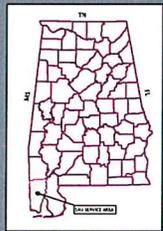
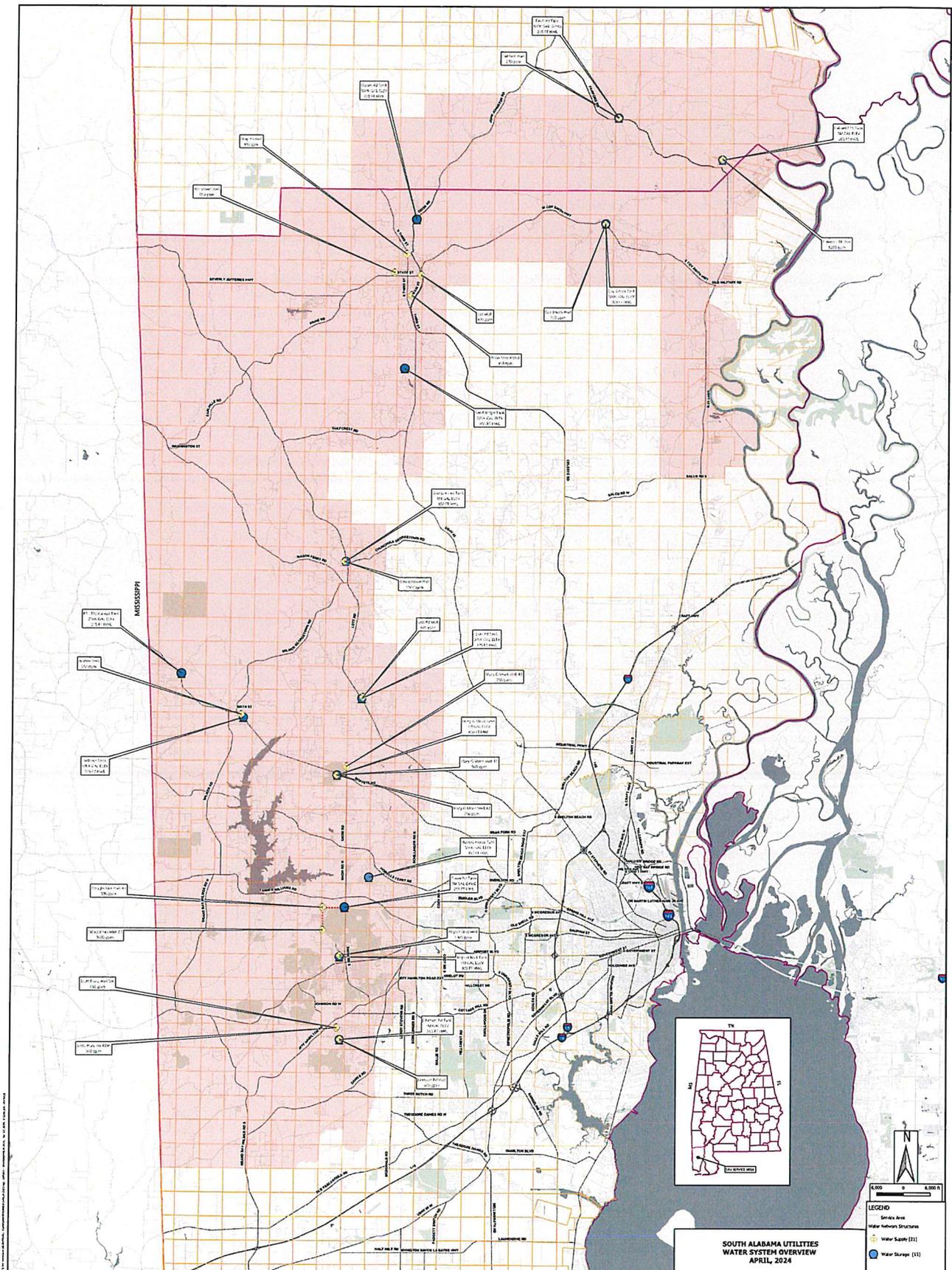
Speaks & Associates  
Consulting Engineers, Inc.

William G. Luker, PE/PLS

WGL/jlm

Enclosures

Cc: John Laney, ADEM  
Marcus Hobbs, Chairman, SAU



**LEGEND**

- Service Area
- Water Network Structures
- Water Supply (11)
- Water Storage (15)

**SOUTH ALABAMA UTILITIES  
WATER SYSTEM OVERVIEW  
APRIL, 2024**

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**SPEAKS & ASSOCIATES**  
**CONSULTING ENGINEERS, INC.**  
 732 OAK CIRCLE DRIVE WEST  
 MOBILE, ALABAMA 36609  
 PHONE: (251) 666-4646 FAX: (251) 666-8868

KR  
**RECEIVED**  
 JUN 11 2025  
 BY: *Mr. [Signature]*

Mikell D. Speaks, PE/PLS (1941-2022)  
 William G. Luker, PE/PLS  
 J. William Parkes, PE  
 John A. Sprinkle, PE  
 Jeremy O. Turner, EI

June 4, 2025

Mr. William Pearson, Field Supervisor  
 U. S. Department of the Interior  
 Fish and Wildlife Service  
 1208 Main Street  
 Daphne, Alabama 36526-4419

**Re: South Alabama Utilities – AMI Meter Replacement**

*2025-0108 221*

Dear Mr. Pearson,

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Sincerely,

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 Consulting Engineers, Inc.

*William G. Luker*

William G. Luker, PE/PLS

WGL/jlm

Enclosures

Cc: John Laney, ADEM  
 Marcus Hobbs, Chairman, SAU



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

No federally listed species/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. We recommend use of best management practices specific to your project (See <https://www.fws.gov/project/best-management-practices-alabama> ).

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

AUG 11 2025

Date



**SPEAKS & ASSOCIATES**  
**CONSULTING ENGINEERS, INC.**  
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MOBILE, ALABAMA 36609  
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*J. William Parkes, PE*  
*John A. Sprinkle, PE*  
*Jeremy O. Turner, EI*

June 9, 2025

To Whom It May Concern  
U. S. Army Corp of Engineers  
Mobile District, Regulatory Division  
P. O. Box 2288  
109 Saint Joseph Street  
Mobile, Alabama 36628-0001

**Re: South Alabama Utilities – AMI Meter Replacement**

To Whom It May Concern:

Speaks & Associates is in the process of preparing an Environmental Information Document (EID) for the project referenced above to obtain funding through the Drinking Water State Revolving Fund (DWSRF). This document will be reviewed by the Alabama Department of Environmental Management (ADEM) so that they may assess the environmental impacts of the project. The proposed project consists of removing approximately 16,500 existing water meters, most being AMR (drive-by radio read type) sizes 3/4 x 5/8-inch through 2-inch, with new AMI water meters equipped with electronic end points which transmit meter reading by cell or radio signal directly to a managed electronic collection site where the meter readings are then forwarded directly to the system operations staff and billing software. Additionally, defective curb stops, customer backflow preventers, and meter boxes will be replaced on an as-needed basis as the work progresses. We have enclosed an overall water system overview map for your use.

We request the assistance of your office in reviewing the information we have provided for compliance with the regulations. Please provide a "No Permit Required" letter for the project, or recommendations or comments you deem appropriate. This letter is vital to the further processing of our funding application. Therefore, we would appreciate a response. Please contact me at 251-666-4646 if you need any additional information or wish to discuss the project further.

Sincerely,

Speaks & Associates  
Consulting Engineers, Inc.

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Enclosures

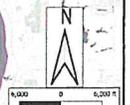
Cc: John Laney, ADEM  
Marcus Hobbs, Chairman, SAU

WASHINGTON COUNTY  
FAIRFORD ROAD TANK

LAT: 31°11'18"N  
LONG: 88°05'19"W  
SECTION 28  
T-3-N R-1-W

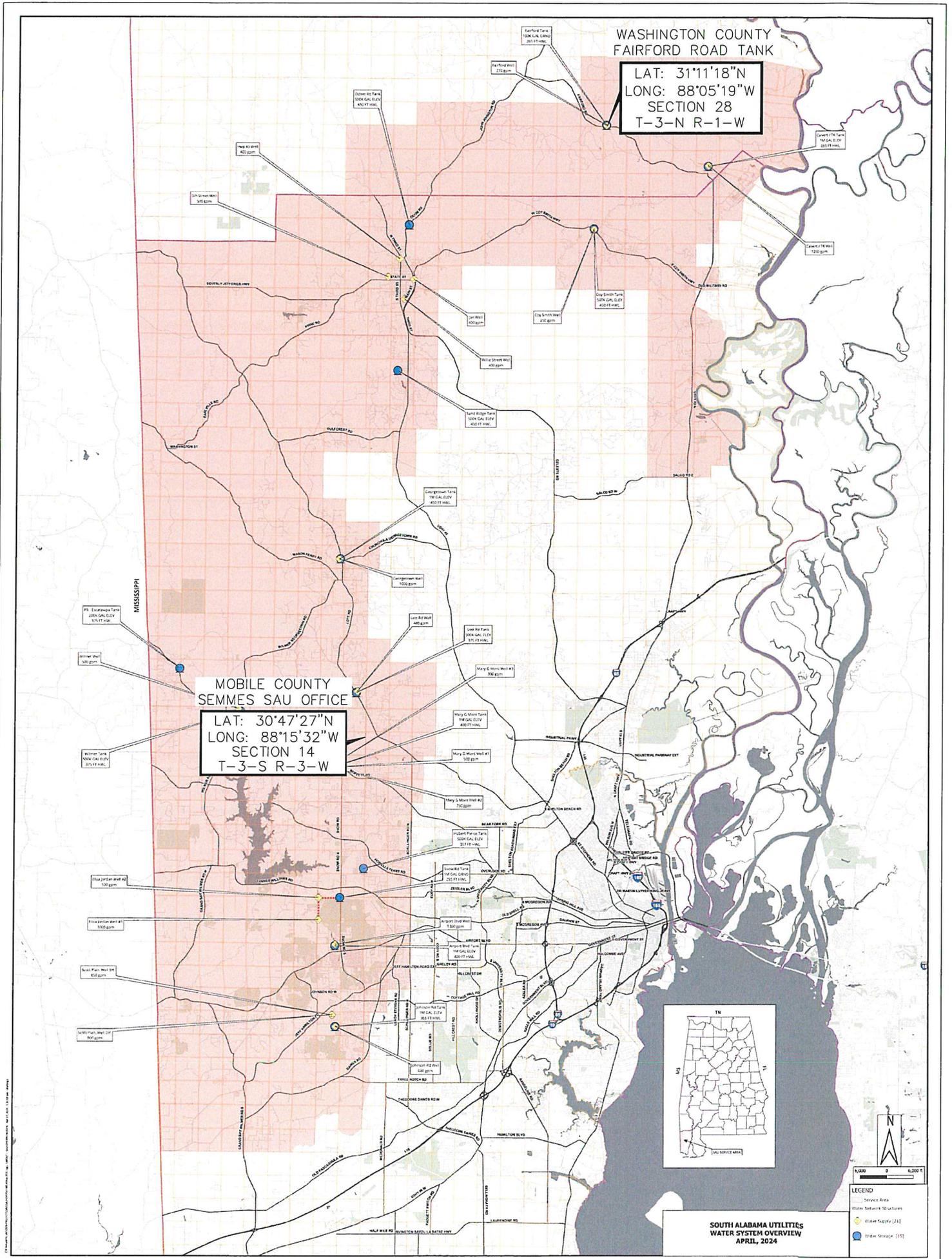
MOBILE COUNTY  
SEMMES SAU OFFICE

LAT: 30°47'27"N  
LONG: 88°15'32"W  
SECTION 14  
T-3-S R-3-W



- LEGEND
- Service Area
  - Water Network Structures
  - Water Supply (24)
  - Water Storage (15)

SOUTH ALABAMA UTILITIES  
WATER SYSTEM OVERVIEW  
APRIL, 2024



## Please fill out items below

### Applicants Name:

First: Marcus

Middle: L

Last: Hobbs

Company: South Alabama Utilities

Company Title: Chairman

Address: 8100 Joy St.

Citronelle, Al 36522

Phone: (251) 866-7061

Mobile: N/A

Email Address: psullivan@southalabamautilities.net

### Authorized Agents Name:

First: William

Middle: Gerald

Last: Luker

Company: Speaks & Associates Consulting Engineers, INC.

Address: 732 Oak Circle Drive West

Phone: 251-666-4646

Mobile: N/A

Email Address: Jerry@speaks.cc

### Location of Proposed Activity:

Latitude: 30° 47' 27" N

Longitude: 88° 15' 32" W

Semmes Office (Mobile County)

Section 12 Township 3 South Range 3 West

Latitude: 31° 11' 18" N

Longitude: 88° 05' 19" W

Fairford Road Tank (Washington County)

Section 28 Township 3 North Range 1 West



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
U.S. ARMY CORPS OF ENGINEERS, MOBILE DISTRICT  
P.O. BOX 2288  
MOBILE, ALABAMA 36628-0001

June 24, 2025

South Alabama Branch  
Regulatory Division

SUBJECT: Department of the Army Jurisdictional Determination, File Number SAM-2025-00441-JJW, South Alabama Utilities, Mobile County and Washington County, Alabama

South Alabama Utilities  
Attention: Mr. Marcus L. Hobbs, Chairman  
Email Address: [psullivan@southalabamautilities.net](mailto:psullivan@southalabamautilities.net)  
8100 Joy Street  
Citronelle, AL 36522

Dear Mr. Hobbs,

Reference is made to a request sent on your behalf for a project to replace the AMI meters for South Alabama Utilities. This project is located at various locations illustrated in the attachments, in Mobile County and Washington County, Alabama.

A desktop evaluation by this office revealed that a Department of the Army permit, pursuant to Section 404 of the Clean Water Act, will not be required for the proposed AMI Meter replacements. We have determined this proposed work, as described in the submitted letter (attached), is a non-regulated activity with regard to Department of the Army regulations and necessitates no further review.

The statements contained herein do not convey any property rights or any exclusive privileges, and do not authorize any injury to property or obviate the requirements to obtain other local, state, or federal authorizations required by law for the activities discussed above. If the scope of work of your project changes, you are urged to contact this office for a verification of this determination. Thank you for your cooperation with our permit program.

You are receiving an electronic copy only of this letter. If you wish to receive a paper copy, you should send a written request to this office at the following address: U.S. Army Corps of Engineers, Mobile District, Regulatory Division, Post Office Box 2288, Mobile, Alabama 36628.

You can contact me by e-mail at [jennifer.j.wilder@usace.army.mil](mailto:jennifer.j.wilder@usace.army.mil) or at

(251) 979-7826, should you have any questions. Please visit our web site at [www.sam.usace.army.mil/Missions/Regulatory.aspx](http://www.sam.usace.army.mil/Missions/Regulatory.aspx) for additional information about our Regulatory Program. Also, please take a moment to complete our customer satisfaction survey located near the bottom of the webpage. Your responses are appreciated and will allow us to improve our services.

Sincerely,

Jennifer J. Wilder, Project Manager  
South Alabama Branch  
Regulatory Division

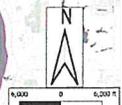
Attachment

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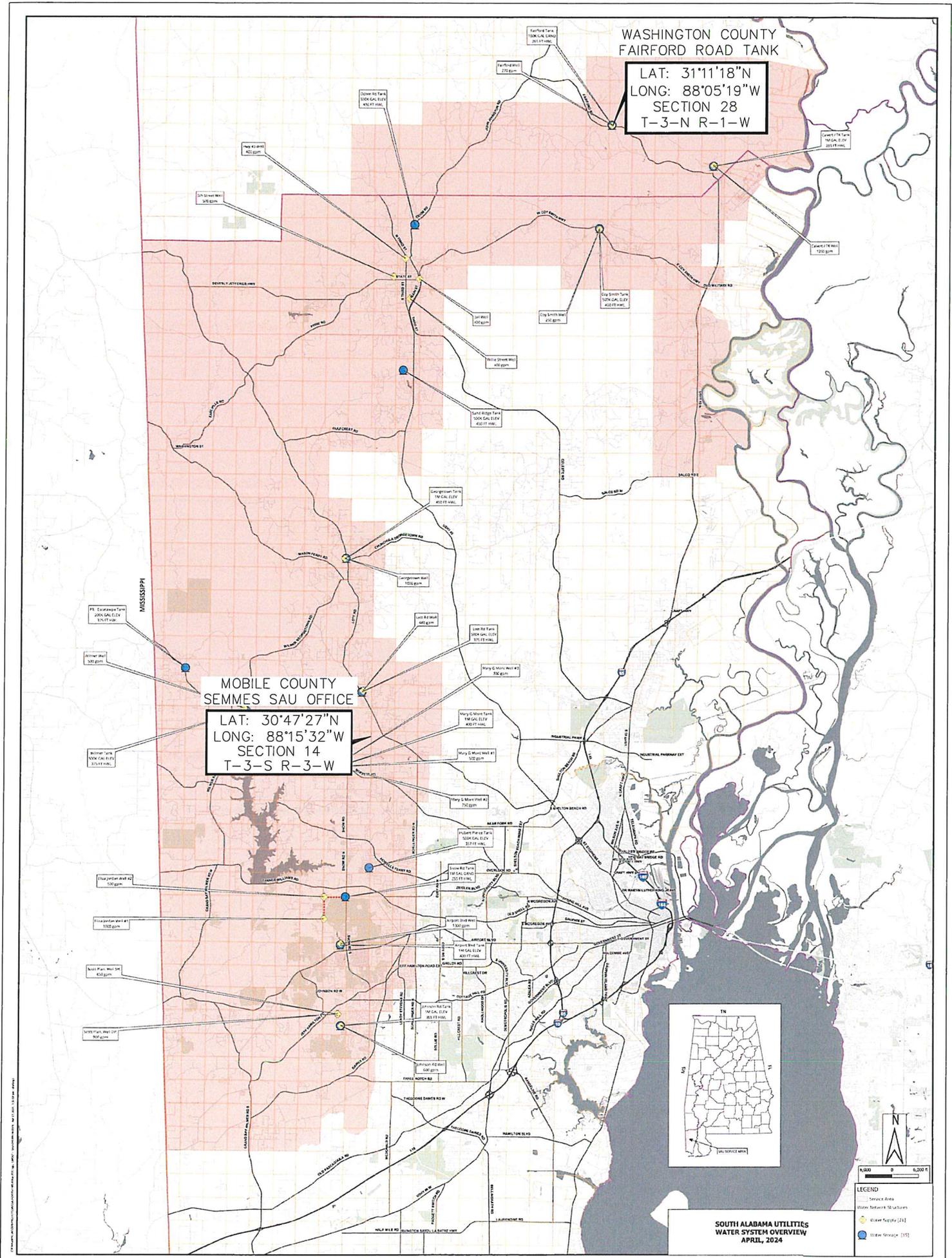
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- LEGEND
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  - Water Network Structures
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SOUTH ALABAMA UTILITIES  
WATER SYSTEM OVERVIEW  
APRIL, 2024





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*John A. Sprinkle, PE*  
*Jeremy O. Turner, EI*

June 4, 2025

Mr. John F. Rhodes, Executive Director  
South Alabama Regional Planning Commission  
110 Beauregard St #207  
Mobile, Alabama 36602-4048

**Re: South Alabama Utilities – AMI Meter Replacement**

Dear Mr. Rhodes,

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WGL/jlm

Enclosures

Cc: John Laney, ADEM  
Marcus Hobbs, Chairman, SAU





## South Alabama Regional Planning Commission

William S. Stimpson, Chairman • Charles H. Murphy, Vice-Chairman  
James R. Staff, Secretary - Treasurer • John F. Rhodes, Executive Director

---

July 10, 2025

William G. Luker, PE, PLS  
SPEAKS & ASSOCIATES  
732 Oak Circle West  
Mobile, AL 36609

**RE: SOUTH ALABAMA UTILITIES  
AMI METER REPLACEMENT**

**Internal SARPC Project Review Control No. 25-3**

Dear Mr. Luker:

In response to the request for a review of this project, attached please find the completed review sheet. This review sheet need not be included in the project application packet (i.e., the Standard Form 424 with supporting documentation).

If you have any questions in this regard or require additional information, please give me a call.

Sincerely,

John F. Rhodes  
Executive Director

/gwc

Enclosure

**SOUTH ALABAMA REGIONAL PLANNING COMMISSION**

**PROJECT REVIEW SHEET**

**INTERNAL SARPC PROJECT CONTROL NO.: 25-3**

**REQUESTING AGENCY: SPEAKS & ASSOCIATES**

**PROJECT: SOUTH ALABAMA UTILITIES  
AMI METER REPLACEMENT**

**Internal SARPC Project Review Control No. 25-3**

**COMMENTS:** (Check one)

Does Not Apply \_\_\_\_\_

Concur  \_\_\_\_\_

No Objection  \_\_\_\_\_

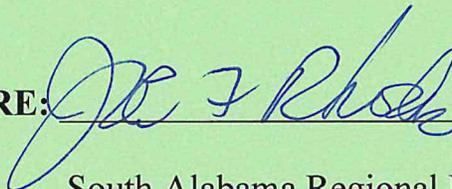
Concur Contingent Upon (Explain Below) \_\_\_\_\_

Need More Information (Explain Below) \_\_\_\_\_

Cannot Concur (Explain Below) \_\_\_\_\_

**EXPLANATION:**

**REVIEWER SIGNATURE:** \_\_\_\_\_



South Alabama Regional Planning Commission  
P.O. Box 1665  
Mobile, AL 36633