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DIRECTOR

JEFFERY W. KITCHENS
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KAY IVEY
GOVERNOR

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

CATEGORICAL EXCLUSION FROM ENVIRONMENTAL REVIEW

Arab Sewer Board
Marshall County and Cullman County

SRF Project No. CS010873-02

June 17, 2026

The Alabama Department of Environmental Management has made **\$1,500,000.00** in financial assistance available to the **Arab Sewer Board** using funds from the Clean Water State Revolving Fund - Infrastructure Investment and Jobs Act (**CWSRF-IIJA**) 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 the potential impacts upon the environment that may result from implementation of this project.

The Arab Sewer Board proposes improvements to the wastewater treatment facility and collection system. The project consists of the installation of new blowers, bubble diffusers, and new flow pacing dosing equipment, and the rehabilitation of sewer lines and lift stations. The proposed project would increase system efficiency, reduce I&I, and minimize SSOs.

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 Mrs. Kelly Bibb, Engineering Section, 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 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/ADC/KMB/lbb

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)

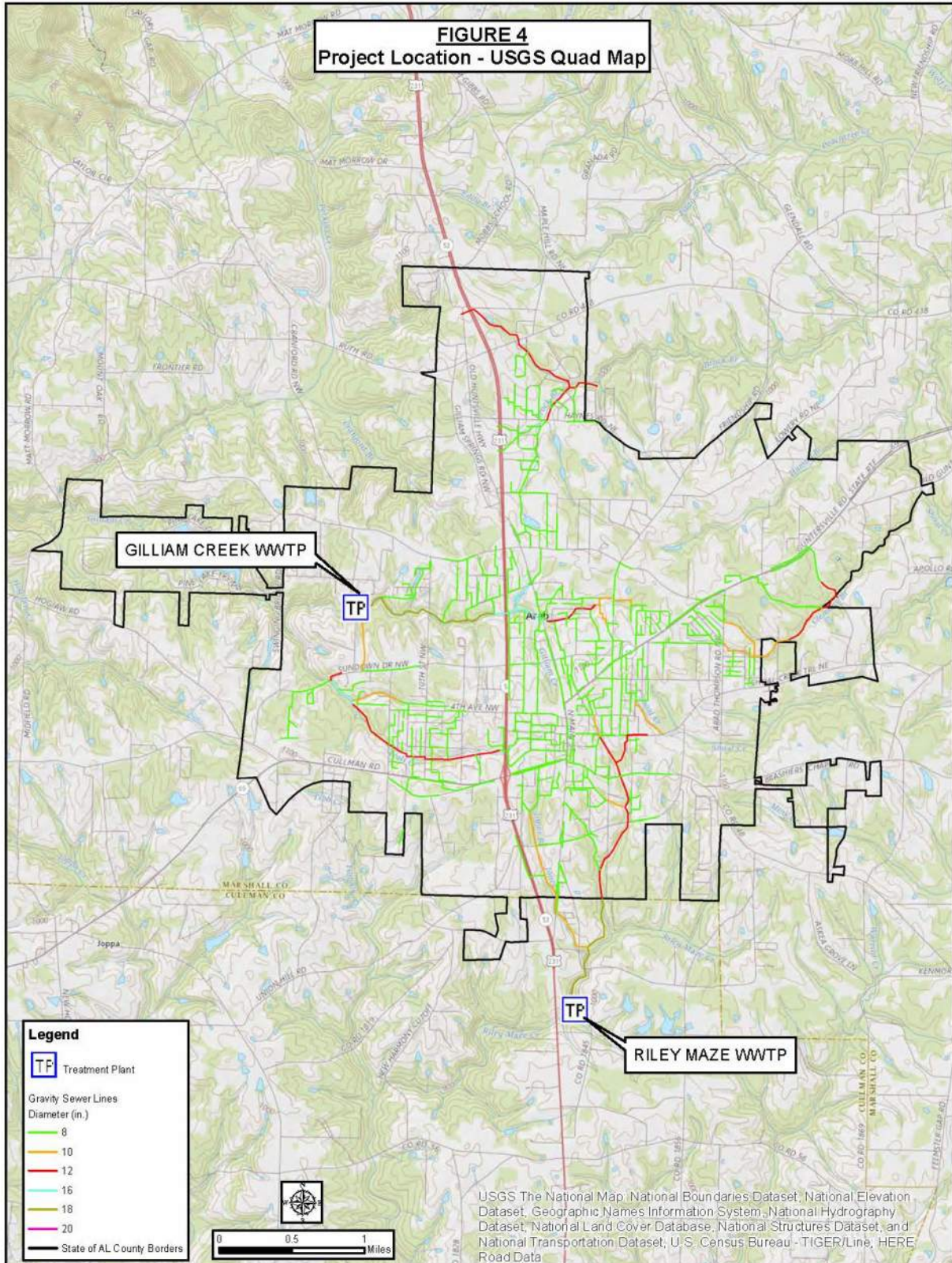
The Categorical Exclusion is promulgated in the State Environmental Review Process (SERP) in Part IV, Section B: Categorical Exclusions for Clean Water State Revolving Fund Projects: (Italicized sections apply.)

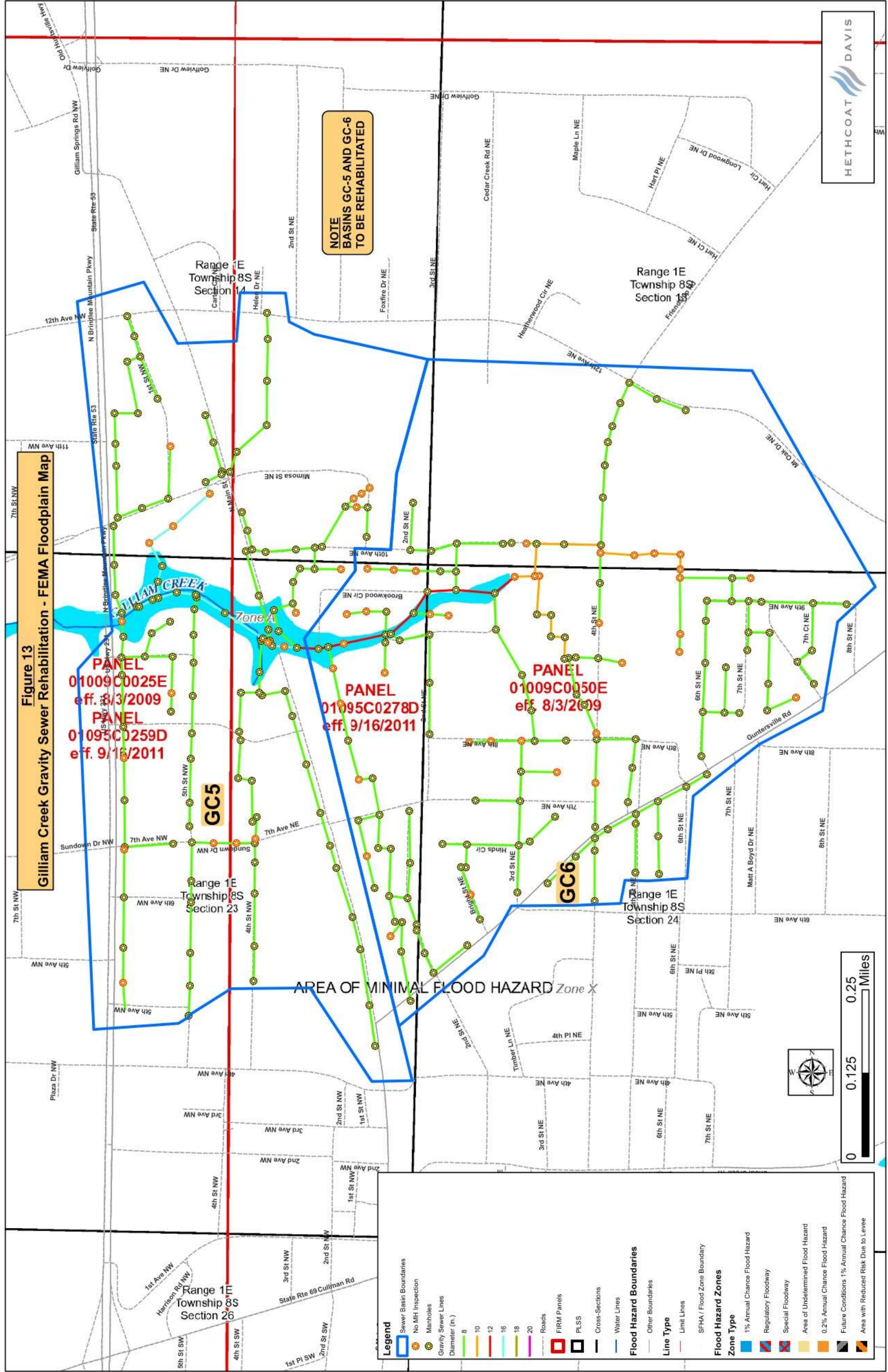
1. The following clean water projects are eligible for categorical exclusions.
 - a. *Actions which are solely directed toward minor rehabilitation of existing facilities, functional replacement of equipment, or towards the construction of new ancillary facilities adjacent or appurtenant to existing facilities;*
 - b. *Actions which do not affect the degree of treatment or capacity of the existing facility including, but not limited to, infiltration and inflow corrections, replacement of existing mechanical equipment or structures, and the construction of small structures on existing sites;*
 - c. Actions which are for minor upgrading and minor expansion of existing treatment works in sewerred communities with a population less than 10,000;
 - d. Actions where on-site technologies are proposed in unsewerred communities of less than 10,000;
 - e. Construction of new wastewater collection systems for existing communities, only if ancillary or appurtenant to existing facilities;
 - f. Projects where funding is being provided for planning and/or engineering costs only (in which case the requirements of IV.B.1 a-f do not apply)
2. In order to determine if a clean water project is eligible for a CE, all of the following conditions must not apply:
 - a. The action is known or expected to have a significant effect on the quality of the human environment, either individually, cumulatively over time, or in conjunction with other federal, State, local, tribal or private actions.
 - b. The action is known or expected to adversely impact:
 - 1) Cultural resources areas such as archaeological and historical sites,
 - 2) Endangered or threatened species and their critical habitats,
 - 3) Environmentally important natural resources areas such as floodplains, wetlands, important farmlands, or aquifer recharging zones.
 - c. This action is known or expected not to be cost-effective or to cause significant public controversy.
 - d. The facilities to be provided will
 - 1) Create a new, or
 - 2) Significantly relocate an existing discharge to surface or ground waters.
 - e. The facilities will result in more than 30% increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters.
 - f. The facilities would provide capacity to serve a population 30% higher than the anticipated design population.

d. Project Location – USGS Quadrangle Map

Figure 4 depicts the project location on a USGS quadrangle map.

FIGURE 4





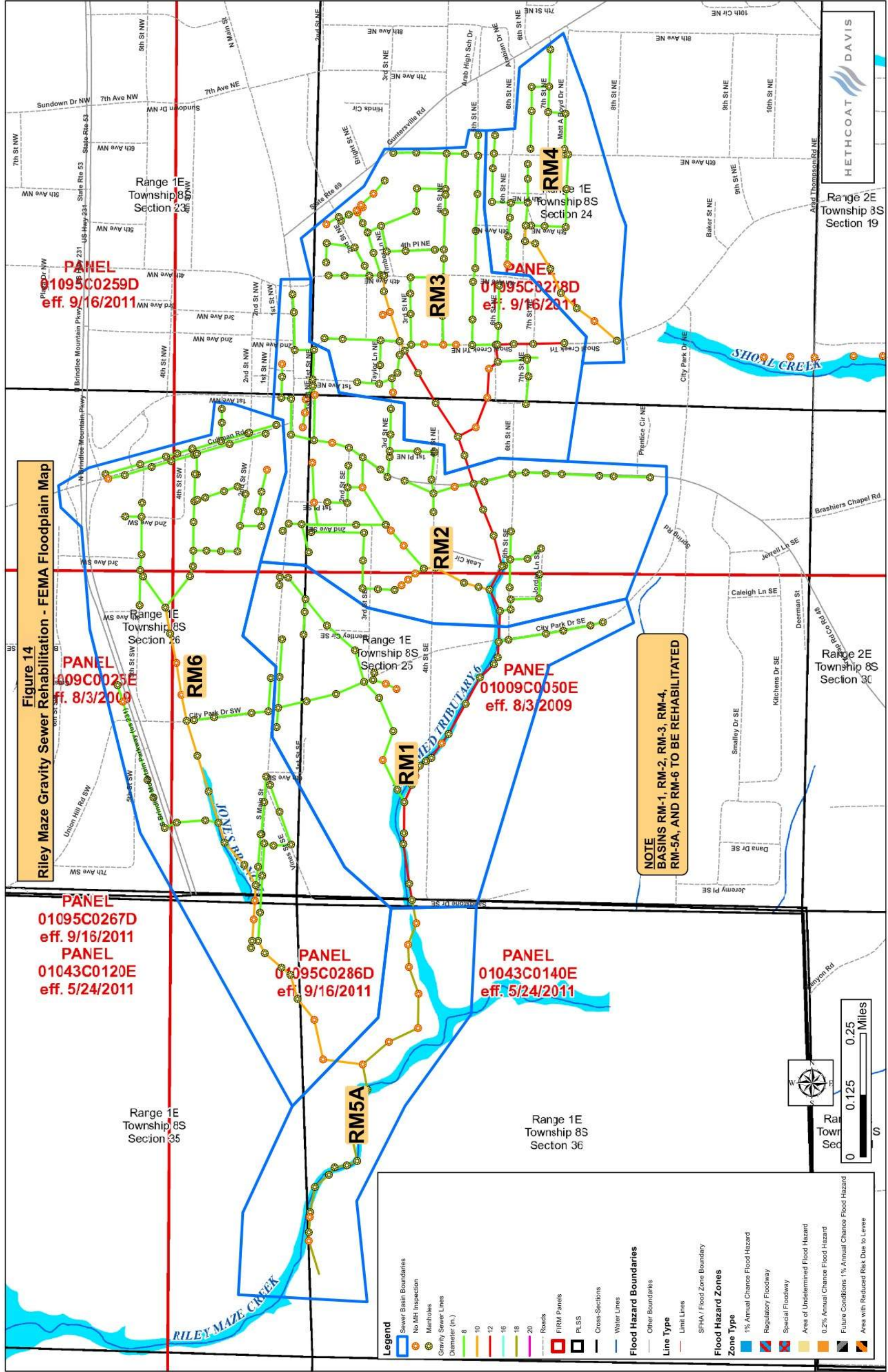
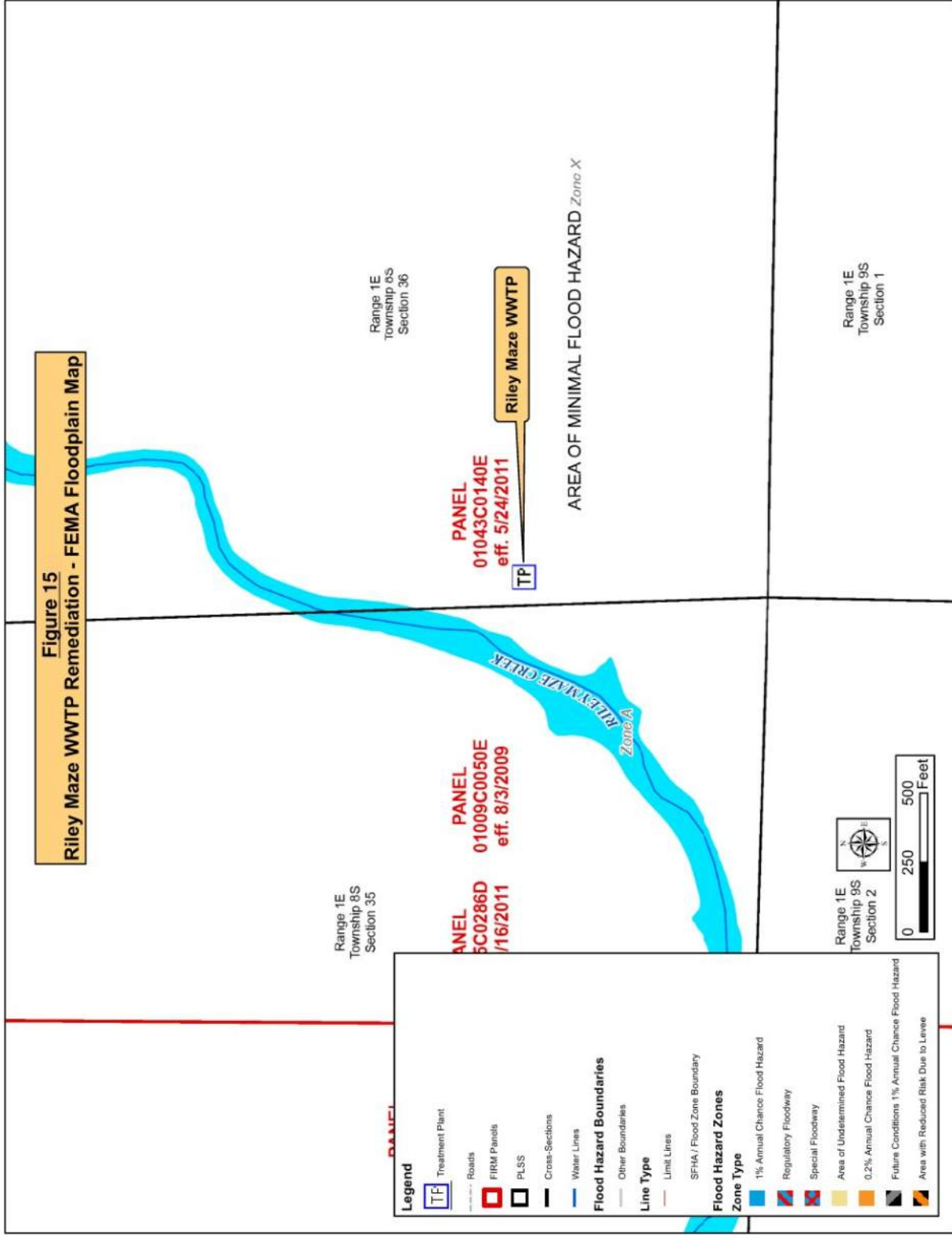


Figure 14
Riley Maze Gravity Sewer Rehabilitation - FEMA Floodplain Map

NOTE
BASINS RM-1, RM-2, RM-3, RM-4,
RM-5A, AND RM-6 TO BE REHABILITATED





H. ENVIRONMENTAL CONSEQUENCES & MITIGATIVE MEASURES

1. HISTORICAL & ARCHAEOLOGICAL FEATURES

2. a. The following concurrence letter was received from USFWS.
3. b. There were no comments from NARCOG that require discussion.



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

December 5, 2025

John Barnes
654 11th Avenue NW
Arab, AL 35016

Re: AHC 26-0140
Arab Sewer System Improvements - Riley Maze Wastewater Treatment Plant Improvements
Marshall and Cullman County

Dear Mr. Barnes:

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,

Handwritten signature of Lee Anne Hewett in blue ink.

Lee Anne Hewett
Deputy State Historic Preservation Officer

LAH/EDS/lah

4. ENDANGERED SPECIES & CRITICAL HABITAT

- a. The following concurrence letter was received from USFWS.
- b. There were no comments from NARCOG that require discussion.

HETHCOAT & DAVIS

December 4, 2025 File 1091-10

Mr. Phillip Carter
USFWS
AL Ecological Services Field Office
1208 Maine Street
Daphne, AL 36526

RECEIVED
DEC 04 2025
BY: *[Signature]*

Via Email to: alabama@fws.gov
Re: Project Code: 2026-0022562, City of Arab Sewer Board - Sewer System Improvements Cover Letter

Dear Mr. Carter:

On behalf of the Arab Sewer Board, we the Engineer (Hethcoat and Davis Engineers) are in the process of submitting a Clean Water State Revolving Fund loan application package in order to acquire funding for a Wastewater System Improvements Project. As part of this process, we must obtain written concurrence for the proposed project from various State and Federal agencies, one of which being the USFWS. We are requesting a letter of concurrence for the Wastewater System Improvements Project which is described in more detail below.

The proposed project is comprised of three primary components:


1. Flow Monitoring Study and Lift Station Evaluation to determine Collection System Rehabilitation
2. Rehabilitation Construction
3. Renovations at the existing Riley Maze wastewater treatment plant

Minimal land disturbance will occur with this project because sewer line rehabilitation will occur within the existing pipe and renovations at the Riley Maze WWTP involves modifications to existing plant components. Nonetheless, Best Management Practices will be required at all construction sites for erosion prevention and sediment control. Please see the plan set submitted through the IPac portal for reference. Pending loan approval, it is anticipated that construction will begin in October 2026.

If you need any further information or have any questions concerning this matter, please contact me at (901) 616-3536 or michael.armour@hder

Sincerely,

[Signature]
Michael Armour, EI
cc: John Barnes, Manager of Arab Sewer
Cory Borum, PE, Hethcoat and Davis
File

 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. IF PROJECT DESIGN CHANGES ARE MADE, PLEASE SUBMIT NEW PLANS FOR REVIEW. SITE MAY CONTAIN WETLANDS. Contact U.S. Army Corps of Engineers for a jurisdictional wetlands determination. We recommend the use of best management practices specific to your project. (See <https://www.fws.gov/project/best-management-practices-alabama>)

[Signature]
Jeffrey R. Powell **MAR 02 2026**
Field Supervisor

Alabama Ecological Services Field Office

278 Franklin Road, Suite 200 • Brentwood, TN 37027 • Phone: (615) 577-4300 • Fax: (615) 577-4303



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET NW
WASHINGTON DC 20314

04/27/2026

Regulatory Mobile District

John Barnes
654 11th Ave NW
Arab, AL 35016
Via Email: arabsewer@otelco.net

Dear Mr. Barnes:

This is an automated response from the U.S. Army Corps of Engineers' Regulatory Request System to your request for confirmation that a Department of the Army (DA) permit is not required for your proposed project. The project/review area is located at 308 County Road 1845, Arab, AL 35016. The project has been assigned a Regulatory Request System Tracking Number 44777. This number should be referenced in all communication concerning this project.

Based on the information you have provided, your work as proposed is not a regulated activity pursuant to Section 10 of the Rivers and Harbors Act of 1899 (RHA) and/or Section 404 of the Clean Water Act (CWA), and therefore, does not require a Department of the Army permit unless new information (including changes to project plans) warrants revision.

This letter does not obviate the requirement to obtain permits from other Federal, State, or local authorities that may be necessary for your project. Additionally, if your project is located in the vicinity of a federal project, approval from the U.S. Army Corps of Engineers (USACE) may be required under Section 14 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 408, "Section 408") to alter or occupy a USACE federally authorized project. It is your responsibility to contact the appropriate District to determine whether Section 408 authorization is required. Additional information about Section 408 can be found at <https://www.usace.army.mil/Missions/Civil-Works/Section408/>.

This letter does not address or include any consideration of geographic jurisdiction of aquatic resources and may not be interpreted as such. Should you desire an official USACE determination that jurisdictional "waters of the United States," or "navigable waters of the United States" are either present or absent on the project site, you may

submit a Request for Jurisdictional Determination / Aquatic Resource Delineation through the Regulatory Request System at: <https://rrs.usace.army.mil/rrs>.

This determination is based solely on the information you provided as of 04/27/2026 and has not been verified by the USACE. It is your responsibility to ensure no unauthorized work in “navigable waters of the United States” or discharges of dredged or fill material into “waters of the United States” occur as part of the proposed project. Performing such an action without obtaining the requisite authorization may be considered a violation of the Rivers and Harbors Act of 1899 and/or the Clean Water Act and may result in enforcement action. Your electronic request and associated responses will be retained by the Corps and may be used for enforcement purposes.

If you have any questions concerning this correspondence, please contact the Mobile District at 251-690-2658 or you may visit the District’s website at <http://www.sam.usace.army.mil/Missions/Regulatory.aspx> for additional information concerning the regulatory program. Please reference this Tracking Number 44777 in all comments and/or inquiries relating to this project.

cc: Michael Armour, Hethcoat & Davis Engineers via michael.armour@hdengr.com

8. REGIONAL PLANNING AGENCY

a. The following concurrence letter was received from TARCOG.



December 2, 2025

Hethcoat and Davis Engineers
ATTN: Michael Armour, E.I.
278 Franklin Road, Suite 200
Nashville, TN

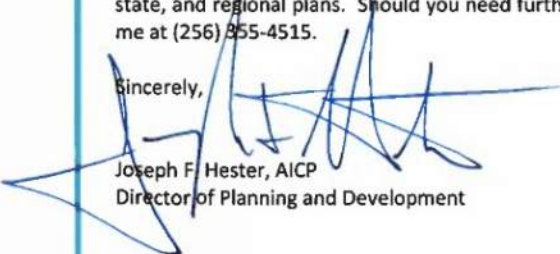
**RE: Letter of Concurrence - CWSRF Application
City of Arab Sewer Board
City of Arab, Cullman County, Alabama**

Dear Ms. Anderson:

The North Central Alabama Regional Council of Governments (NARCOG) has reviewed the information provided for the City of Arab's Sewer Board proposed treatment plant improvements project in the City of Arab, Alabama, and we offer our concurrence. NARCOG understands that the scope of the proposed project includes improvements to the Riley Maze WWTP and various Collection System Rehabilitation located in both Cullman and Marshall County. The Collection System Rehabilitation will include a flow monitoring study and lift station evaluations. Following this study and evaluation, rehabilitation recommendations will be implemented.

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

Sincerely,


Joseph F. Hester, AICP
Director of Planning and Development

cc: Robby Cantrell, Executive Director

North Central Alabama Regional Council of Governments
216 Jackson Street SE • Post Office Box C • Decatur, Alabama 35602
256.355.4515 • Fax 256.351.1380 • www.narcog.org

b. There were no comments from NARCOG that require discussion.