

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

Kushla Water District

Mobile County DWSRF # FS010094-02

July 15, 2026

The Alabama Department of Environmental Management has made **\$2,102,270** in financial assistance available to the **Kushla Water District** using funds from the FY 2024 Drinking Water State Revolving Fund Infrastructure Investment and Jobs Act (**DWSRF-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 potential impacts upon the environment that may result from implementation of this project.

The Kushla Water District proposed "facilities" include the construction of a new groundwater supply well and associated water treatment facility, as well as the rehabilitation and upgrade of existing Well #3 within the Kushla Water District system.

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 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 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

LRL/ADC/JWL/kbh
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)

Kushla Water District
DWSRF# FS010094-02

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 KWD Service Area

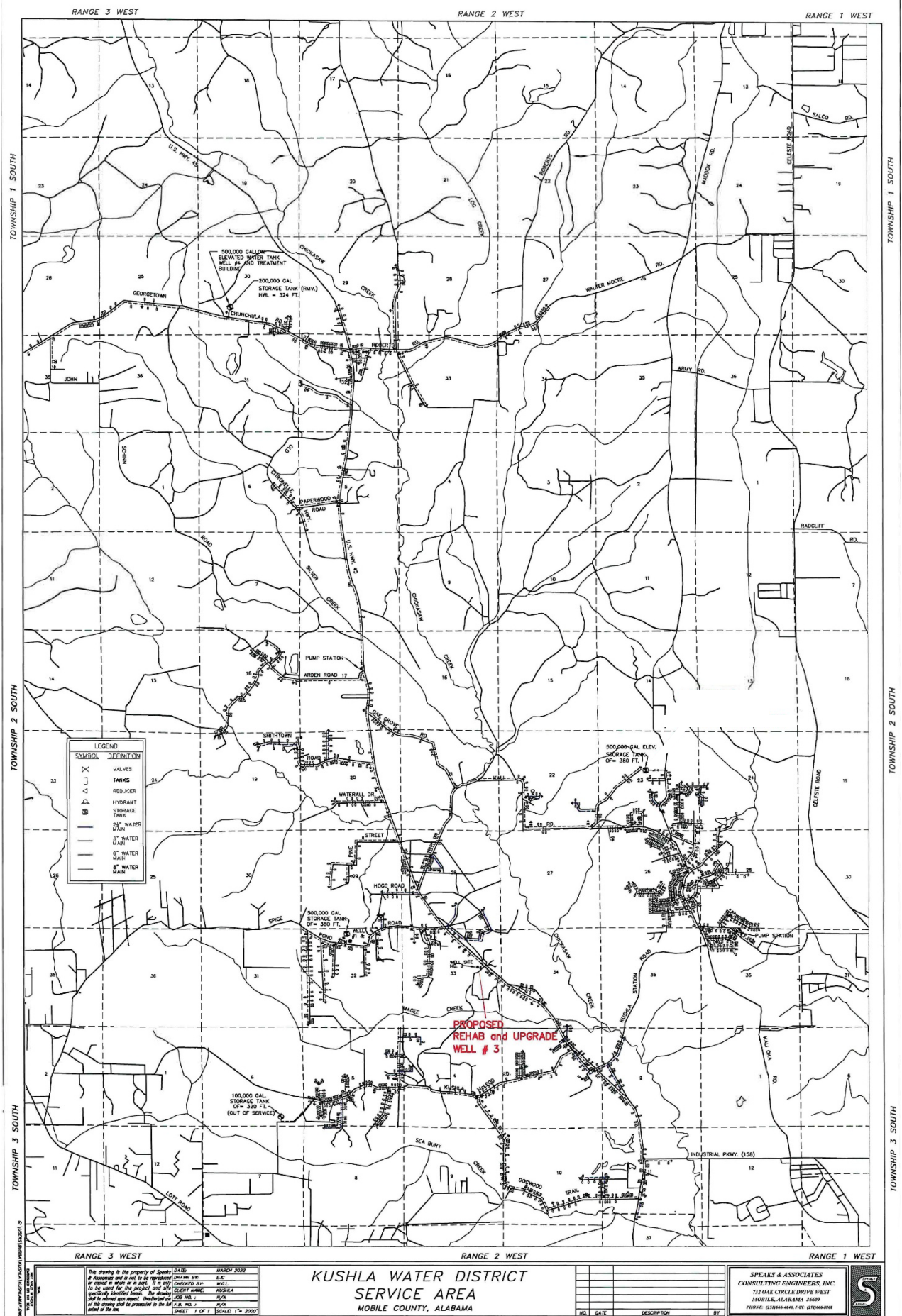


Figure 1: Overview of KWD Service Area

Appendix B: Overview Map of Flood Zones in the KWD Service Area

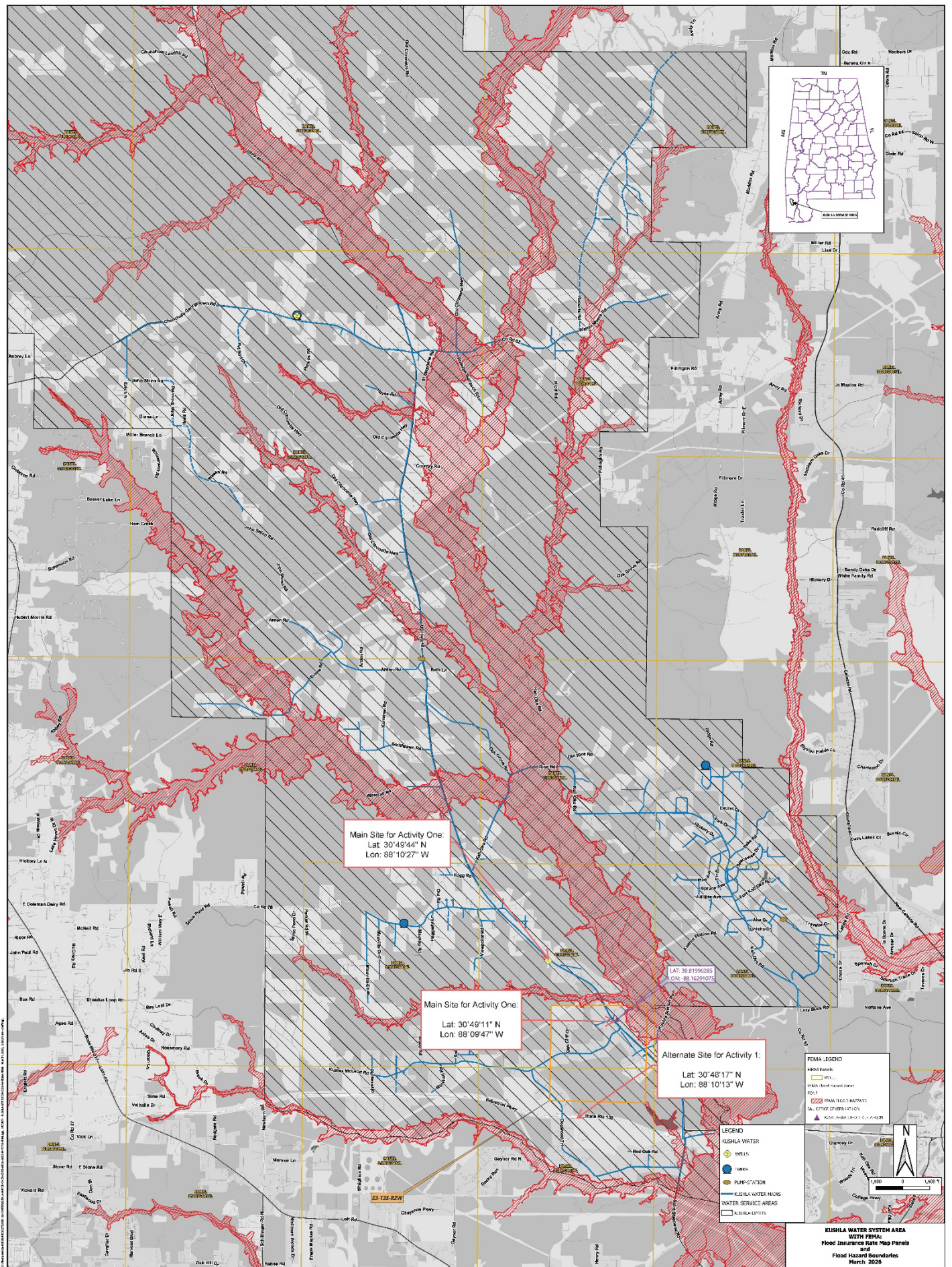


Figure 2: Overview of FEMA Flood Zones in the KWD Service Area

Appendix C: Concurrency Letters from Involved Agencies

Figure 3: AHC Section 106 Concurrency Packet/Correspondence (Pg. 31-38)

Figure 4: Fish & Wildlife IPaC Packet/Correspondence (Pg. 39-60)

Figure 5: COE “No Permit” Packet/Correspondence (Pg. 61-73)

Figure 6: SARPC Concurrency Letter/Correspondence (Pg. 74-82)



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

March 31, 2026

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

Re: AHC 26-0478
Kushla Water District's -New Water Supply Well
Mobile County

Dear Ms. McIlwain:

Upon review of the above referenced project, we have determined the following. Our files indicate that the main site for Activity I is an area known to have significant cultural resources. Therefore, we consider this area archaeologically sensitive. Project activities at the remaining two potential project sites should not impact cultural resources.

We request that a professional archaeologist perform Phase II testing of the main site of Activity I. A proposed methodology should be forwarded to our office prior to commencement of field work.

We appreciate your commitment to helping us preserve Alabama's historic archaeological and architectural resources. Should you have any questions, please contact Amanda McBride at 334.230.2692 or Amanda.McBride@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



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

April 10, 2026

Mr. William Pearson, Field Supervisor
U.S. Fish and Wildlife Service
Alabama Ecological Services Field Office
1208 Main Street
Daphne, Alabama 36526-4419

Re: Kushla Water District – New Water Supply Well DWSRF Project
Project Code: 2026-0073331

Dear Mr. Pearson:

Speaks & Associates is preparing an Environmental Information Document (EID) for the above-referenced project to obtain funding through the Drinking Water State Revolving Fund (DWSRF) program administered by the Alabama Department of Environmental Management (ADEM).

The proposed project consists of two primary activities:

- Construction of a new water supply well and water treatment building
- Rehabilitation and repair of existing Well #3

Activity 1 includes the construction of a new groundwater well, treatment facility, and associated infrastructure at the primary site located at 6210 U.S. Highway 45 in Eight Mile, Alabama. An alternate site located along Highway 158 will only be utilized if the primary test well does not yield sufficient water.

Activity 2 consists of the rehabilitation of existing Well #3 located at 6649 U.S. Highway 45, including the replacement and upgrading of pumping equipment and associated components.

All project activities will occur within previously developed, cleared, and actively maintained utility properties. No undisturbed or natural habitats will be impacted.

An official species list was obtained through the U.S. Fish and Wildlife Service IPaC system for the project area (Project Code: 2026-0073331). The list identifies six federally listed or proposed species that may occur within the broader project vicinity, including:

- West Indian Manatee (*Trichechus manatus*) – Threatened
- Alligator Snapping Turtle (*Macrochelys temminckii*) – Proposed Threatened
- Black Pinesnake (*Pituophis melanoleucus lodingi*) – Threatened
- Eastern Indigo Snake (*Drymarchon couperi*) – Threatened
- Gopher Tortoise (*Gopherus polyphemus*) – Threatened
- Monarch Butterfly (*Danaus plexippus*) – Proposed Threatened

Based on site conditions, project scope, and the disturbed nature of all project areas, the proposed activities will have **no effect** on federally listed or proposed threatened and endangered species or their habitats. No designated critical habitat occurs within the project area.

The project will not involve in-stream work, placement of fill material, or disturbance of wetlands or other waters of the United States. Jurisdictional wetlands and waters have been evaluated in coordination with the U.S. Army Corps of

Engineers (Mobile District), under project reference **SAM-2026-00595**. Based on the scope and location of the proposed activities, no impacts to regulated waters are anticipated.

We respectfully request your concurrence that the proposed project will have no effect on federally listed or proposed threatened and endangered species.

Don't hesitate to get in touch with our office at (251) 666-4646 if additional information is needed or if you would like to discuss the project further.

Sincerely,

Jennifer McIlwain

Speaks & Associates Consulting Engineers, Inc

732 Oak Circle Drive West

Mobile, AL 36609

(251)666-4646

jennifer@speaks.cc

c/o William G. Luker, PE/PLS

jerry@speaks.cc

Enclosures

Cc: John Laney, ADEM

William Andrews, Chairman, Kushla Water District



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>).

Jeffrey R. Powell

Field Supervisor

Alabama Ecological Services Field Office

APR 29 2026

Date

3



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, MOBILE DISTRICT
100 CANAL STREET
MOBILE, AL 36602-1901

April 21, 2026

Special Projects Branch
Regulatory Division

SUBJECT: Department of the Army, Consultation letter, File Number SAM-2026-00595-MNS,
Kushla Water District -Water Supply Well, Kushla, Alabama.

Kushla Water District -Water Supply Well,
Speaks & Associates Consulting Engineers Inc
Attention: Ms. Jennifer McIlwain
6210 US Highway 45
Eight Mile, Alabama 33613

Transmitted electronically to: jennifer@speaks.cc and jmarquis-kwd@att.net

Dear Ms. McIlwain:

This is in response to your letter on behalf of the Kushla Water District, dated April 7, 2026, requesting Department of Army (DA), U.S. Army Corps of Engineers (USACE) review of the proposed project consists of the construction of a new water supply well and water treatment building and the rehabilitation and repairs to existing "Well #3". The approximate center coordinate of the construction site is near latitude 30.81972 North, longitude 88.16305 West. This project has been assigned file number SAM-2026-00595-MNS, which should be referenced in all future correspondence regarding this project.

Section 404 of the Clean Water Act (33 U.S.C. 1344) specifically addresses discharges of dredged and/or fill material into waters of the United States (U.S.), including wetlands, and requires that a Department of the Army (DA) permit must be obtained prior to conducting any work that would include a discharge of dredged and/or fill material into waters of the U.S. The proposed project involves: 1. Construction of a new water supply well and water treatment building, 2. Rehabilitation and repairs to existing "Well #3". As indicated in your letter, potential aquatic resources were not identified in your review area including the alternative well site located adjacent to HWY 158. Based on our review of the project information submitted and desktop mapping resources available to us, as specified herein, a DA Permit pursuant to Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act of 1899 may **not be required** since the proposed project activities will not involve discharges of dredged and/or fill material in waters of the U.S. including wetlands.

Any proposed modifications to the project location or scope of work for activity #1, or anticipated ground disturbance or discharge of fill material in waters of the U.S. including wetland, should be coordinated with our office prior to commencing the activity. Section 404 of

the Clean Water Act requires that a Department of the Army (DA) permit be obtained for the placement or discharge of dredged and/or fill material into waters of the U.S. However, **If no discharges of dredged and/or fill material in waters of the U.S. including wetlands, then a DA permit would not be required.**

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 assents required by law for the activities discussed above. If the scope of work or project locations change, you are urged to contact this office for a verification of this determination.

We appreciate your cooperation with the USACE Regulatory Program. Please contact me at munther.n.sahawneh@usace.army.mil or (251) 318-4373, if you have any questions concerning this matter. For additional information about our Regulatory Program, visit our web site at <http://www.sam.usace.army.mil/Missions/Regulatory.aspx>. Also, please take a moment to complete our customer satisfaction survey located under the Menu header on the right side of our webpage. Your responses are appreciated and will allow us to improve our services.

Sincerely,

Munther N. Sahawneh
Special Projects Branch
Regulatory Division

Enclosures



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

March 27, 2026

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

Re: Kushla Water District – Water Supply Well

Dear Mr. Rhodes:

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 2 activities:

1. Construction of a new water supply well and water treatment building
2. Rehabilitation and repairs to existing "Well #3"

On site construction for activity 1 of the project will consist of the construction of a new water supply well, along with a water treatment building which will include a new gas chlorination system for disinfection, along with polyphosphate feed equipment. A standby generator, paved access drive, yard piping modifications, and other necessary appurtenances will also be installed. This site is located at 6210 U.S. Hwy 45, Eight Mile, AL 36613, which is the primary site of this work.

An alternate well site is also included for activity 1, which is located on the south side of state Route Hwy 158 approximately 1 mile west of U.S. Hwy 45. This site will only be utilized should the test well at the primary site would not yield a sufficient quantity of suitable water for a new supply well.

On site construction for activity 2 of the project will consist of the removal of existing pumping equipment from the well, cleaning the interior of the well casing, and assessing the need for complete replacement or refurbishment. At minimum, the pump shafting, bowls, and column piping will be new and sized for the existing hydro-geologic and system service conditions. Additionally, installation of a new generator and electrical service will be included. This site is located at 6649 U.S. Hwy 45, Eight Mile, AL 36613. All three sites for the scope of this project are located on previously developed property owned by Kushla Water District. For your use, we have provided an overall water system overview map along with maps showing the individual sites.

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.

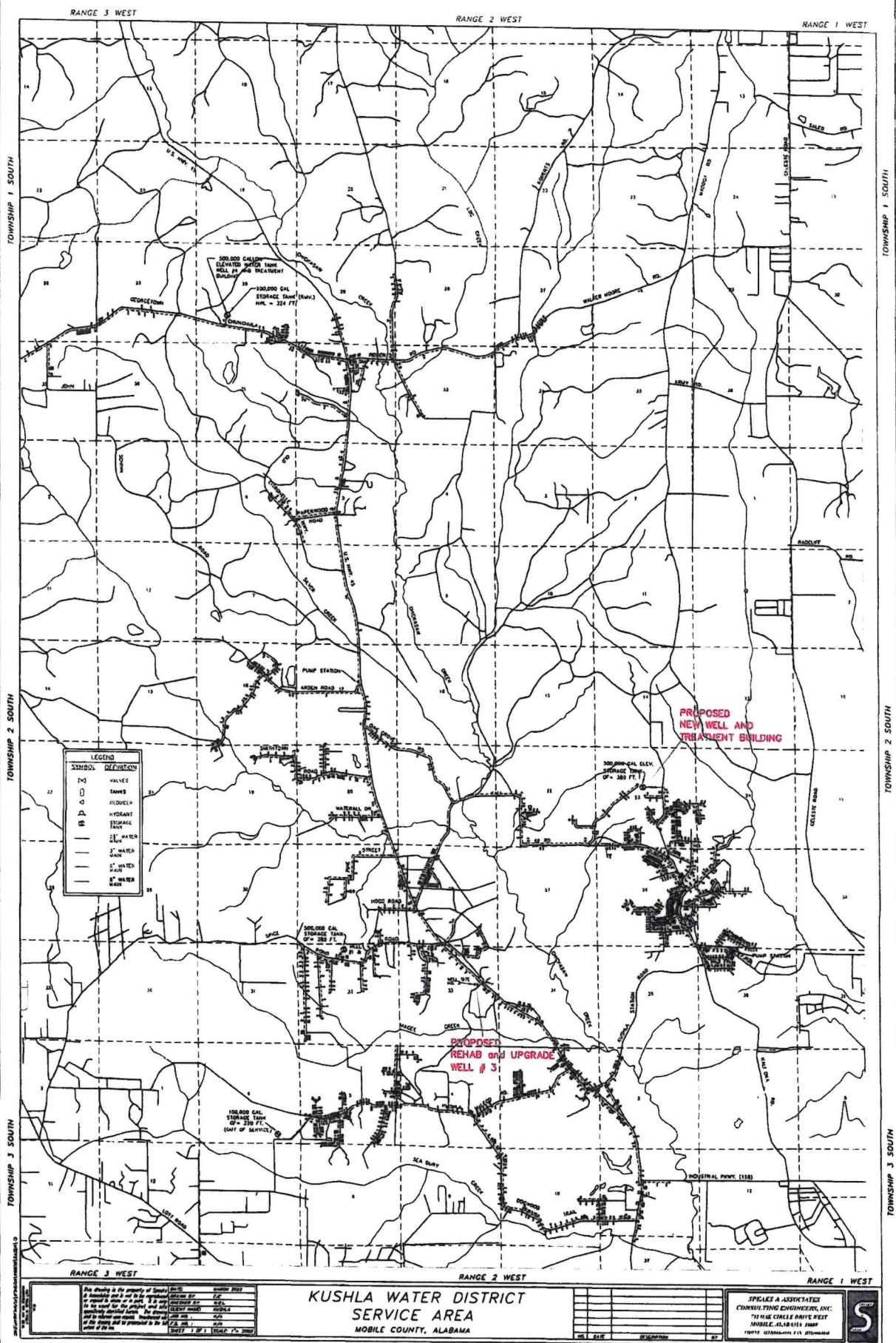
Sincerely,

Speaks & Associates
Consulting Engineers, Inc.

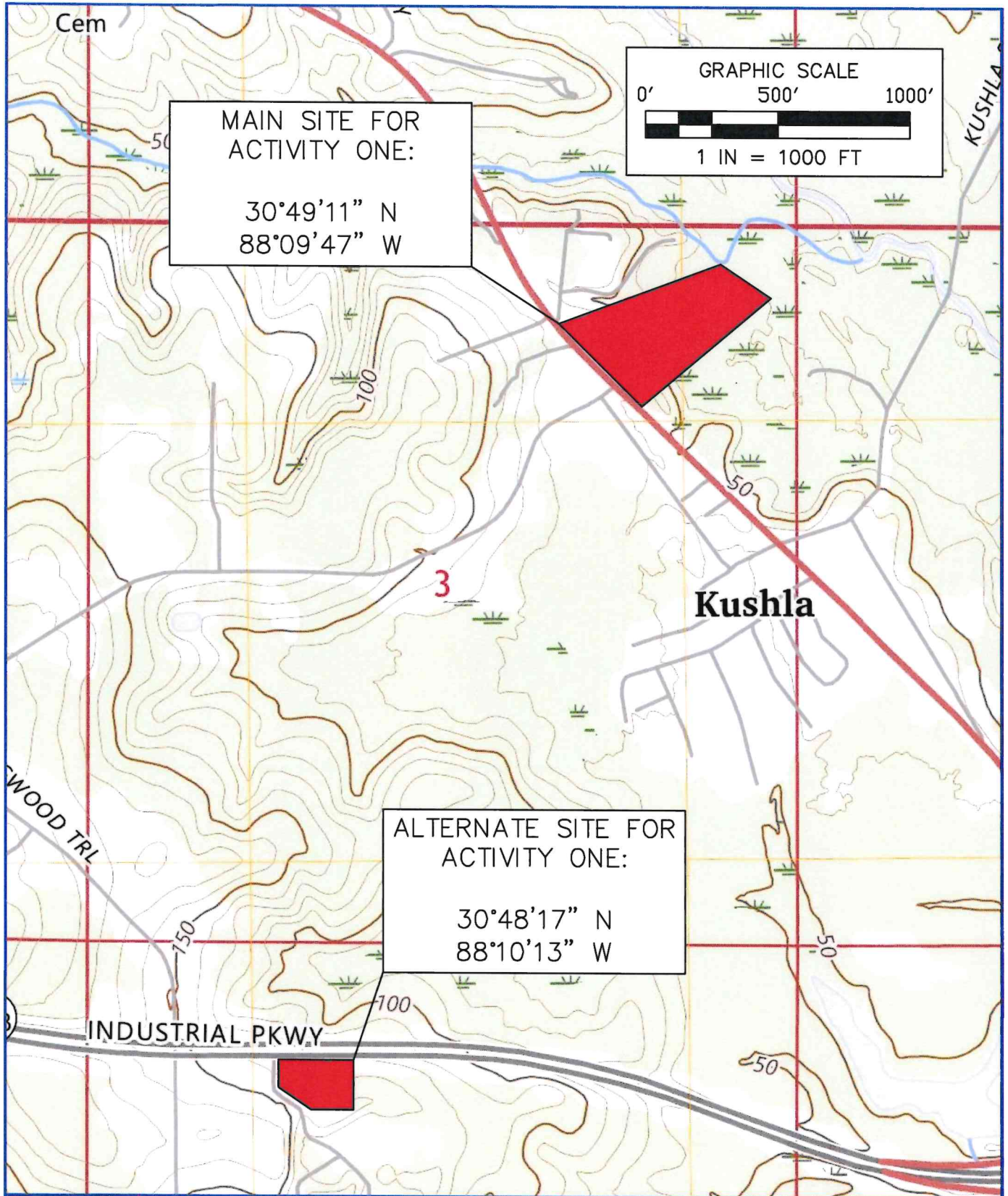
William G. Luker, PE/PLS
WGL/jlm

Enclosures

Cc: John Laney, ADEM
William Andrews, Chairman, KWD



Z:\Files\users\jennifer\1 - DWSRF Grants\Kushla Water - DWSRF\Quads\KUSHLA - ACTIVITY ONE QUAD.dwg, Mar 19, 2026 - 10:18:37AM, Survey2



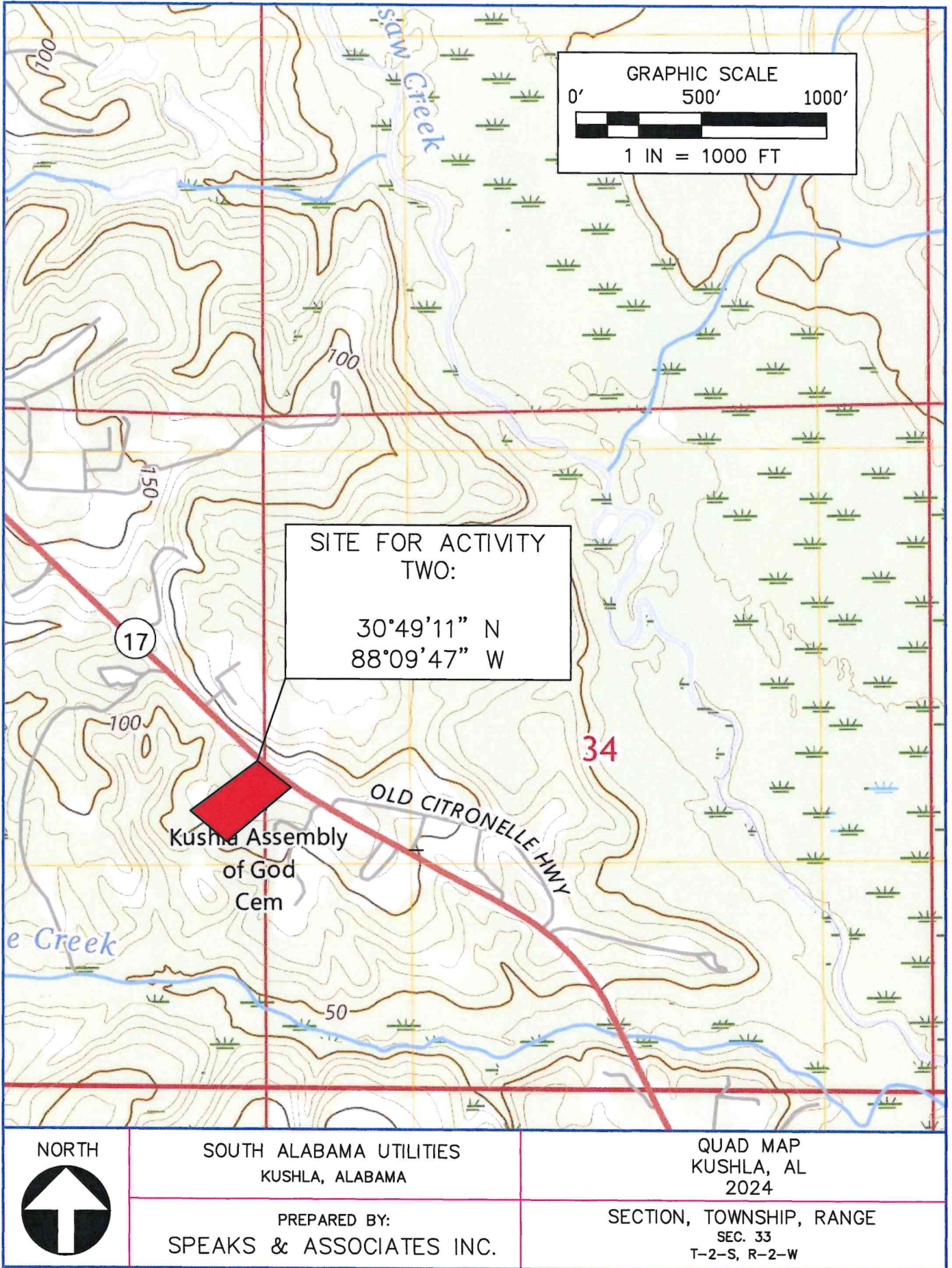
SOUTH ALABAMA UTILITIES
KUSHLA, ALABAMA

PREPARED BY:
SPEAKS & ASSOCIATES INC.

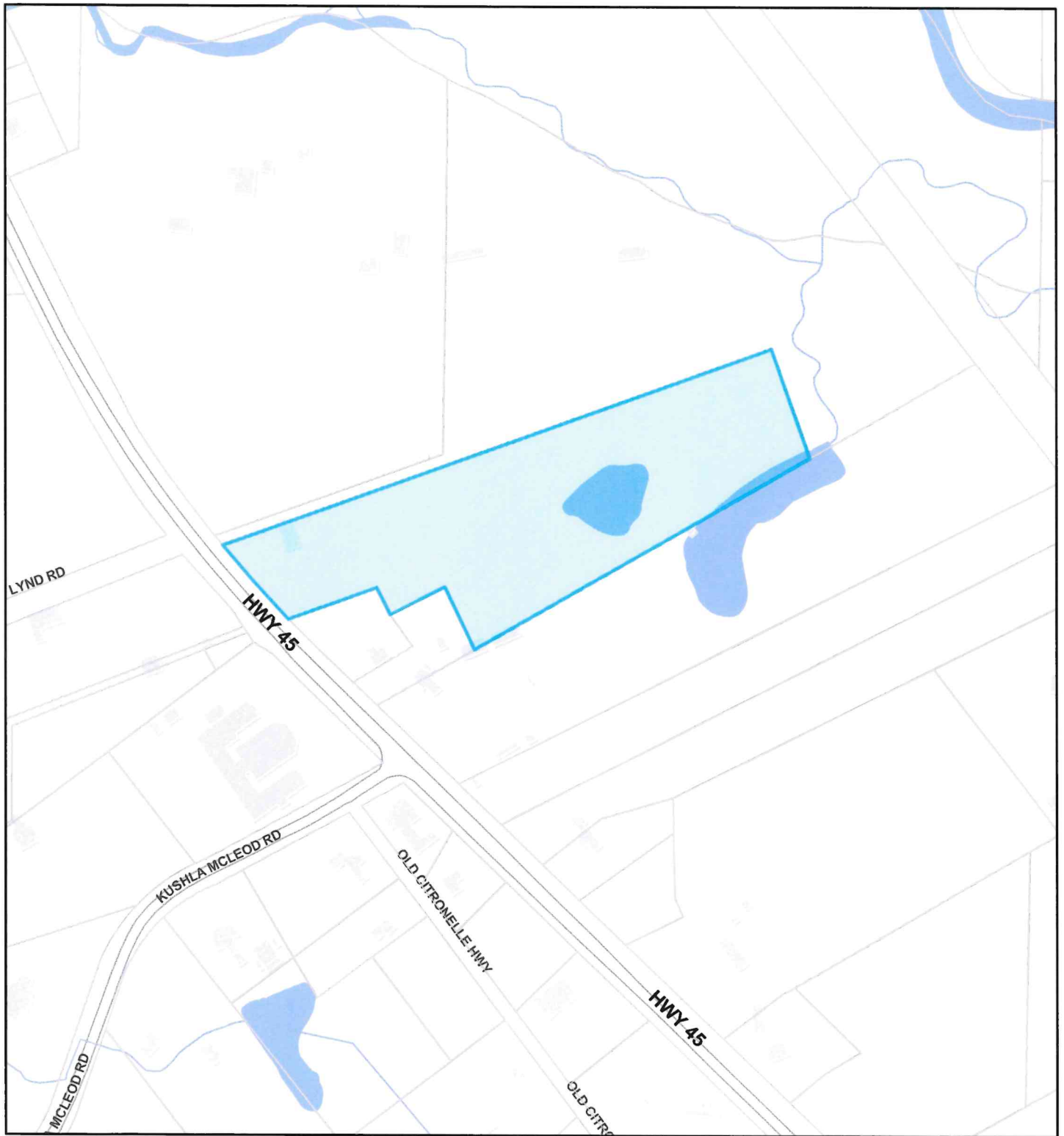
QUAD MAP
KUSHLA, AL
2024

SECTION, TOWNSHIP, RANGE
SEC. 3 & 10
T-3-S, R-2-W

Z:\Files\users\Jennifer\1 - DWSRF Grants\Kushla Water - DWSRF Quads\KUSHLA - ACTIVITY TWO QUAD.dwg, Mar 19, 2026 - 11:11:52AM, Survey2

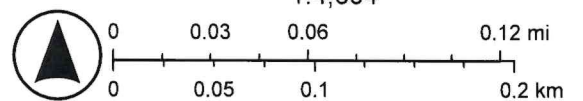


Activity One: Main Site

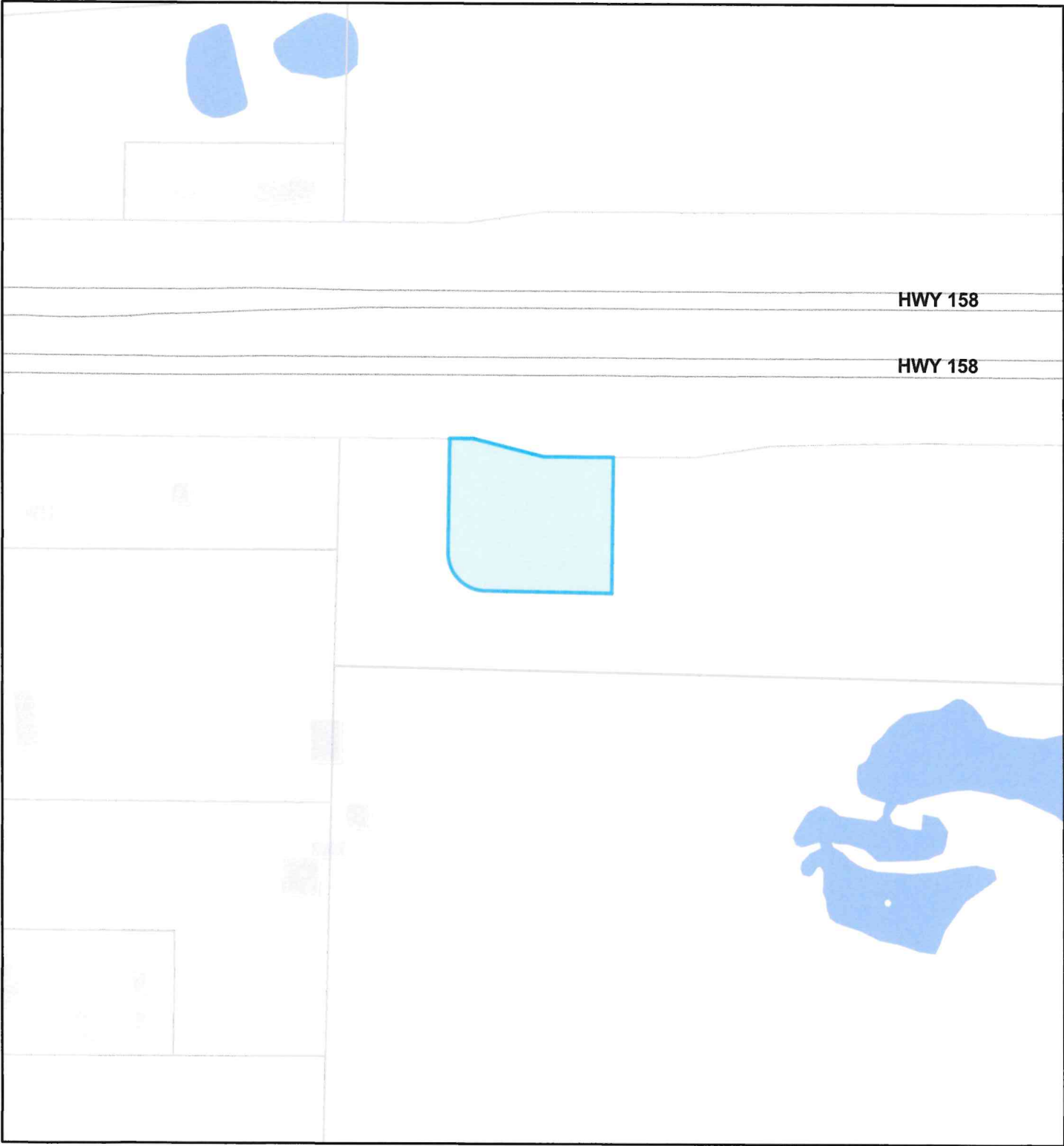


4/8/2026, 9:32:18 AM

Parcel Details

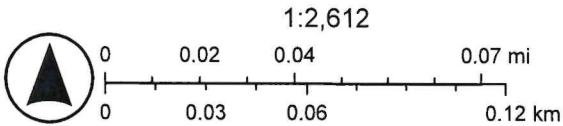


Activity One: Alternate Site



4/8/2026, 9:34:21 AM

Parcel Details

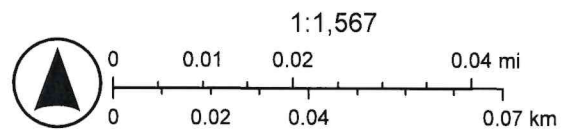


Activity Two Site



4/8/2026, 9:36:44 AM

Parcel Details





South Alabama Regional Planning Commission

Charles Gruber, Chairman • Mark Barlow, Vice-Chairman
Larry White, Secretary - Treasurer • John F. Rhodes, Executive Director
Tom Piper, Assistant Executive Director

April 6, 2026

Jennifer McIlwain
SPEAKS & ASSOCIATES
732 Oak Circle Drive West
Mobile, AL 36609

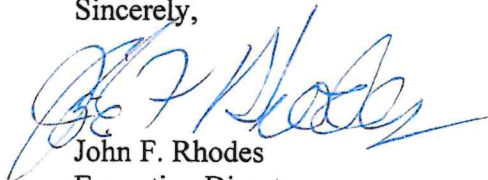
**RE: Kushla Water District
New Water Supply Well and Upgrades
Internal SARPC Project Review Control No. 26-2**

Dear Ms. McIlwain:

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.: 26-2

REQUESTING AGENCY: SPEAKS & ASSOCIATES
CONSULTING ENGINEERS, INC.

PROJECT: Kushla Water District
New Water Supply Well and Upgrades

Scope of project:

1. Construction of a new water supply well and treatment building
2. Rehabilitation of existing "Well #3"

Internal SARPC Project Review Control No. 26-2

COMMENTS: (Check one)

Does Not Apply

Concur

No Objection

Concur Contingent Upon (Explain Below)

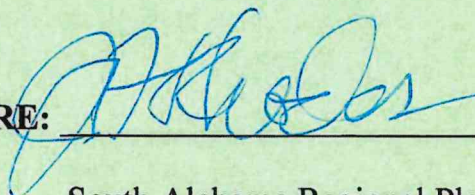
Need More Information (Explain Below)

Cannot Concur (Explain Below)

☒ _____

EXPLANATION:

REVIEWER SIGNATURE:



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