<u>Why You Should Read This</u>: The document below reviews the environmental impact likely from a project. This project is planned to be federally funded through your tax dollars; therefore, you are entitled to take part in its review. If you have concerns about the environmental impact of this project, raise them now. We encourage public input in this decision making process.



IOWA STATE REVOLVING FUND FINDING OF NO SIGNIFICANT IMPACT

February 3, 2023

To: All Interested Citizens, Government Agencies, and Public Groups

An environmental review has been performed based on the procedures for implementing the National Environmental Policy Act (NEPA), for the proposed agency action below:

Applicant: City of Hedrick SRF Number: FS-54-22-DWSRF-026
County: Keokuk lowa DNR Project Number: W2022-0082

State: Iowa

Other Federal Funding: CDBG (\$300,000)

The City of Hedrick, Iowa is planning an upgrade to their water supply infrastructure. The city has applied for financial assistance through the State Revolving Fund (SRF) loan program to build the project. The State Revolving Loan Program is a program authorized by the Environmental Protection Agency (EPA) and administered by the Iowa Department of Natural Resources (DNR) in partnership with the Iowa Finance Authority.

The City of Hedrick is located in Keokuk County, Iowa approximately 109 miles southwest of Davenport, Iowa and 16 miles northeast of Ottumwa, Iowa. The population of Hedrick according to the 2020 US Census was 652. The design population equivalent for the year 2040 is 652.

Currently, the city's water supply is purchased from the Wapello Rural Water Association, Inc. (WRWA). The Hedrick elevated storage tank (water tower) has a total volume of 50,000 gallons and is a riveted tank with a conical roof. The riser pipe is insulated and has a stainless-steel shield. The exterior coating on the tank is less than 5 years old, and the age of the interior coating is not known. The water tower was evaluated in 2020. That inspection determined that the tower needs immediate rehabilitation or replacement and that, even with rehabilitation, replacement would be required within the next 10 years. The tower's coating contains lead and is in poor condition. There are also physical safety concerns with the tower.

The Hedrick water distribution system consists of a valve station, an elevated storage tank, and water main piping and appurtenances. WRWA delivers water to the City's valve station, which was formally the water treatment plant. The water treatment plant was abandoned in approximately 2009 when Hedrick connected to WRWA. The Hedrick elevated storage tank is filled by gravity flow with pressure from WRWA. New PVC water mains were installed in approximately 1985 to improve the water distribution system, however, several sections of cast iron pipe are still in service. The water distribution system also has sections of 1-inch and smaller piping that is used to service multiple houses. Significant water loss has been an issue for the City, but recent leak identification and repair work has substantially reduced the percentage of water loss.

The purpose of this project is to make improvements to the water distribution infrastructure to enhance their reliability, increase capacity and to replace obsolete system to safely and reliably operate the City of Hedrick's water distribution system for at least the next 20 years. The proposed construction includes replacement of the existing 50,000 gallon water tower with a 75,000 gallon, 120-feet tall water tower. Excavation limits depend on soils, but are estimated at 60-feet x 60-feet x 10-feet deep; approx. 550-feet of 8-inch trenched or directional bored water main. The trench is estimated at 5-feet wide x 5-feet deep. The existing water tower will be demolished. Excavation may include (5) 4-feet x 4-feet x 3-feet deep holes.

The project will not significantly affect the pattern and type of land use (industrial, commercial, agricultural, recreational, and residential) or growth and distribution of population. The project will not conflict with local, regional or State land use plans or policies. The project will not impact wetlands. The project will not affect threatened and endangered species or their habitats. If any Sate- or Federally-listed threatened or endangered species or communities are found during the planning or construction phases, additional studies and/or mitigation may be required. The project will not displace population, alter the character of existing residential areas, or convert significant farmlands to non agricultural purposes. The project will not affect the 100 year flood plain. The project will not have effect on parklands, preserves, other public lands, or areas of recognized scenic or recreational value.

The proposed project can proceed with conditions (SHPO R&C#220754566). A Memorandum of Agreement among the EPA, IDNR, SHPO, and City of Hedrick was executed on February 3, 2023. Through this agreement, the City agreed to specific mitigation steps to address the removal of the historic water tower. However, if project activities uncover any item(s) that might be of archaeological, historical, or architectural interest, or if important new archaeological, historical, or architectural data should be encountered in the project APE, the applicant should make reasonable efforts to avoid further impacts to the property until an assessment can be made by an individual meeting the Secretary of the Interior's professional qualifications standards (36 CFR Part 61).

The project will not have a significant adverse effect upon local ambient air quality provided the applicant takes reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property during the proposed project (567 IAC 23.3(2)"c"). The project will not have a significant adverse effect upon local ambient noise levels, surface water

quantity, groundwater quality or quantity, or water supply. No significant impact to surface water quality, shellfish, wildlife, or their natural habitats.

Minimum separation distances will be maintained. Noise during construction will be maintained at tolerable levels through controls on construction activities. Any construction debris will be removed from the site for proper disposal. Adverse environmental effects from construction activities will be minimized with proper construction practices, inspection, prompt clean up and other appropriate measures. Areas temporarily disturbed by the construction will be restored.

It has been determined that the proposed action will result in no significant impacts to the surrounding environment. This determination is based on a careful review of the engineering report, the environmental assessment and other supporting data which are on file at the Department of Natural Resources' office in Des Moines, Iowa. These are available for public review upon request. A copy of the environmental assessment is attached. This Department will not take any administrative action on the project for at least thirty (30) calendar days from the above date. Persons disagreeing with the above environmental decision may submit comments to the department during this period. Please direct your comments to me at Karrie.Darnell@dnr.iowa.gov or 515-725-8340.

Sincerely,

Karrie Darnell Environmental Specialist 502 E. 9th Street Des Moines, IA 50319-0034

Enclosures: Environmental Assessment

Project Map

Distribution

List (email): Matthew Walker, Garden & Associates, Ltd.

Holly Berg, Area 15 Regional Planning Commission

Kelly Beard-Tittone, EPA Region 7

Michael Drummond, Council on Environmental Quality

Jake Hansen, Iowa Department of Agriculture and Land Stewardship

Ken Sharp, Iowa Department of Public Health

Sara Carmichael-Stanley, Iowa Department of Public Health

Leslie Leager, Iowa Economic Development Authority

Ingrid Gronstal, Iowa Environmental Council

Tracy Scebold, Iowa Finance Authority Alyson Fleming, Iowa Finance Authority Mickey Shields, Iowa League of Cities

Jane Clark, Sierra Club

Josh Mandelbaum, Environmental Law and Policy Center

Kate Sand, USDA Rural Development
Tokey Boswell, USDOI, National Park Service, Midwest Region
Kraig McPeek, Fish and Wildlife Service, Rock Island Field Office
Christopher Simmons, USEPA Region VII
Kelly Beard-Tittone, USEPA Region VII
Miami Tribe of Oklahoma
Clarion Plainsmen/Southeast Union (Local Newspaper)

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IOWA STATE REVOLVING FUND ENVIRONMENTAL ASSESSMENT DOCUMENT

PROJECT IDENTIFICATION

Applicant: City of Hedrick SRF Number: FS-54-22-DWSRF-026
County: Keokuk Iowa DNR Project Number: W2022-0082

State: Iowa

Other Federal Funding: The City is applying for \$300,000 CDBG funding

COMMUNITY DESCRIPTION

Location: The City of Hedrick is located in Keokuk County, Iowa approximately 109 miles southwest of Davenport, Iowa and 16 miles northeast of Ottumwa, Iowa.

Population: The population of Hedrick according to the 2020 US Census was 652. The design population equivalent for the year 2040 is 652.

Current Source of Water: Currently, the city's water supply is purchased from the Wapello Rural Water Association, Inc. (WRWA).

Current Water Storage: The Hedrick elevated storage tank (water tower) has a total volume of 50,000 gallons and is a riveted tank with a conical roof. The riser pipe is insulated and has a stainless-steel shield. The exterior coating on the tank is less than 5 years old, and the age of the interior coating is not known. The water tower was evaluated in 2020. That inspection determined that the tower needs immediate rehabilitation or replacement and that, even with rehabilitation, replacement would be required within the next 10 years. The tower's coating contains lead and is in poor condition. There are also physical safety concerns with the tower.

Current Distribution System: The Hedrick water distribution system consists of a valve station, an elevated storage tank, and water main piping and appurtenances. WRWA delivers water to the City's valve station, which was formally the water treatment plant. The water treatment plant was abandoned in approximately 2009 when Hedrick connected to WRWA. The Hedrick elevated storage tank is filled by gravity flow with pressure from WRWA. New PVC water mains were installed in approximately 1985 to

improve the water distribution system, however, several sections of cast iron pipe are still in service. The water distribution system also has sections of 1-inch and smaller piping that is used to service multiple houses. Significant water loss has been an issue for the City, but recent leak identification and repair work has substantially reduced the percentage of water loss.

PROJECT DESCRIPTION

Purpose: The purpose of this project is to make improvements to the water distribution infrastructure to enhance their reliability, increase capacity and to replace obsolete system to safely and reliably operate the City of Hedrick's water distribution system for at least the next 20 years.

Proposed Improvements: The proposed construction includes replacement of the existing 50,000 gallon water tower with a 75,000 gallon, 120-feet tall water tower. Excavation limits depend on soils, but are estimated at 60-feet x 60-feet x 10-feet deep; approx. 550-feet of 8-inch trenched or directional bored water main. The trench is estimated at 5-feet wide x 5-feet deep. The existing water tower will be demolished. Excavation may include (5) 4-feet x 4-feet x 3-feet deep holes.

ALTERNATIVES CONSIDERED

Alternatives Considered: Three alternatives were considered: No-Action, rehabilitate the existing Hedrick water tower, and construction of a new water tower.

Reasons for Selection of Proposed Alternative: The No-Action alternative is not viable as the City of Hedrick would experience violations for the condition of the existing water tower and ultimately the tank would fail due to corrosion. The City would not be able to provide safe portable water to its residents. While rehabilitation of the existing water tower would provide the lowest capital cost, it would required higher annual operation and maintenance costs compared to the construction of a new water tower. Rehabilitation would not address the need for a larger to tank to adequately supply water to the community. A new water tower was selected as it is the most long-term solution and will provide safe water to the City for years to come. The project site was selected for the availability of land, proximity to existing infrastructure, engineering criteria, capital cost, operational costs and considerations, as well as minimization of the impacts to the environment.

MEASURES TAKEN TO ASSESS IMPACT

Public Involvement: A public hearing was held on October 17, 2022 at 6:30PM at the City's regular council meeting. The public notice of this hearing was published in the September 15, 2022. The purpose of this hearing was to present the environmental and financial impacts of the proposed improvement project. No written or oral comments were received.

Coordination and Documentation with Other Agencies and Special Interest Groups: The following Federal, state and local agencies were asked to comment on the proposed project to better assess the potential impact to the environment:

U.S. Army Corps of Engineers

U.S. Fish and Wildlife Service

State Historical Society of Iowa (State Historical Preservation Office)

Iowa DNR Conservation and Recreation Division

Iowa DNR Flood Plain Management Section

Citizen Band Potawatomi Indian Tribe

Flandreau Santee Sioux

Ho-Chunk Nation

Iowa Tribe of Kansas and Nebraska

Iowa Tribe of Oklahoma

Kickapoo Tribe in Kansas

Kickapoo Tribe of Oklahoma

Lower Sioux Indian Community Council

Miami Tribe of Oklahoma

Omaha Tribal Council

Osage Tribal Council

Otoe-Missouria Tribe

Pawnee Nation of Oklahoma

Peoria Tribe of Indians of Oklahoma

Ponca Tribe of Indians of Oklahoma

Ponca Tribe of Nebraska

Prairie Band Potawatomi Nation

Prairie Island Indian Community

Sac & Fox Nation of Mississippi in Iowa

Sac & Fox Nation of Missouri

Sac & Fox Nation of Oklahoma

Santee Sioux Nation

Shakopee Mdewakanton Sioux Community

Sisseton-Wahpeton Oyate

Spirit Lake Tribal Council

Three Affiliated Tribes Mandan, Hidatsa & Arikara Nations

Upper Sioux Tribe

Winnebago Tribal Council

Yankton Sioux Tribal Business and Claims Committee

No adverse comments were received from any agencies or general public. Conditions placed on the applicant by the above agencies in order to assure no significant impact are included in the Summary of Reasons for Concluding No Significant Impact section.

ENVIRONMENTAL IMPACT SUMMARY

Construction: Traffic patterns within the community may be disrupted and above normal noise levels in the vicinity of the construction equipment can be anticipated during construction and should be a temporary problem. Adverse environmental impacts on noise quality will be handled by limited hours of contractor work time during the day. Other adverse environmental effects from construction activities will be

minimized by proper construction practices, inspection, prompt cleanup, and other appropriate measures. Areas temporarily disturbed by the construction will be restored. Solid wastes resulting from the construction project will be regularly cleared away with substantial efforts made to minimize inconvenience to area residents.

Care will be taken to maintain dirt to avoid erosion and runoff. Temporary air quality degradation may occur due to dust and fumes from construction equipment. The applicant shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property during the proposed project (567 lowa Administrative Code IAC 23.3(2)"c"). If construction activities find an unknown area of contamination, it is the responsibility of the applicant to follow the procedure for notification of hazardous conditions (567 IAC 131.2). Excavated soil that contains a hazardous substance must be assessed and properly disposed of (567 IAC 100.4).

Historical/Archaeological: Various Native American tribes with an interest in the area were provided information regarding the project. An architectural history investigation of the proposed project area indicated that the existing water tower has been deemed eligible for listing on the National Register of Historic Places due to its early construction as well as its connection to the Des Moines Bridge and Iron Company. Results from this investigation and a completed Phase I Archaeological Survey, were submitted to the State Historical Preservation Office (SHPO) for review. The proposed project can proceed with conditions (SHPO R&C#220754566). A Memorandum of Agreement among the EPA, IDNR, SHPO, and City of Hedrick was executed on February 3, 2023. Through this agreement, the City agreed to specific mitigation steps to address the removal of the historic water tower. However, if project activities uncover any item(s) that might be of archaeological, historical, or architectural interest, or if important new archaeological, historical, or architectural data should be encountered in the project APE, the applicant should make reasonable efforts to avoid further impacts to the property until an assessment can be made by an individual meeting the Secretary of the Interior's professional qualifications standards (36 CFR Part 61).

Environmental: According to the Iowa DNR Conservation and Recreation Division, the proposed project will not interfere with any State-owned parks, recreational areas or open spaces. The U.S. Army Corps of Engineers concurs that the project will not impact wetlands. The project will not impact any wild and scenic rivers as none exist within the State of Iowa. The U.S. Fish & Wildlife Service Section 7 Technical Assistance website consultation determined, and Iowa DNR Conservation and Recreation Division concurred, that the project will not impact threatened or endangered species or their habitats. However, if any State- or Federally-listed threatened or endangered species or communities are found during the planning or construction phases, additional studies and/or mitigation may be required. According to the Iowa DNR Water Resources Section, this project will not impact the 100-year floodplain. No adverse impacts are expected to result from this project, such as those to surface water quantity, or groundwater quality or quantity. No significant impact to surface water quality, fish, shellfish, wildlife, or their natural habitats is expected.

Land Use and Trends: The project will not displace population nor will it alter the character of existing residential areas. The proposed project is within the present corporate limits of Hedrick in areas zoned residential, commercial, or industrial. No significant farmlands will be impacted. This project should not impact population trends as the presence or absence of existing water/sewer infrastructure is unlikely to induce significant alterations in the population growth or distribution given the myriad of factors that influence development in this region. Similarly, this project is unlikely to induce significant alterations in the pattern and type of land use.

Irreversible and Irretrievable Commitment of Resources: Fuels, materials, and various forms of energy will be utilized during construction.

POSITIVE ENVIRONMENTAL EFFECTS TO BE REALIZED FROM THE PROPOSED PROJECT

Positive environmental effects will be maintained water quality for the citizens of Hedrick. A catastrophic loss of water supply could result in City-wide health impacts due to a lack of sanitation and the use of other water sources that may not meet Federal drinking water standards.

SUMMARY OF REASONS FOR CONCLUDING NO SIGNIFICANT IMPACT

- The project will not significantly affect the pattern and type of land use (industrial, commercial, agricultural, recreational, and residential) or growth and distribution of population.
- The project will not conflict with local, regional or State land use plans or policies.
- The project will not impact wetlands.
- The project will not affect threatened and endangered species or their habitats. If any Sate- or Federally-listed threatened or endangered species or communities are found during the planning or construction phases, additional studies and/or mitigation may be required.
- The project will not displace population, alter the character of existing residential areas, or convert significant farmlands to non-agricultural purposes.
- The project will not affect the 100-year flood plain.
- The project will not have effect on parklands, preserves, other public lands, or areas of recognized scenic or recreational value.
- The proposed project can proceed with conditions (SHPO R&C#220754566). A Memorandum of Agreement among the EPA, IDNR, SHPO, and City of Hedrick was executed on February 3, 2023. Through this agreement, the City agreed to specific mitigation steps to address the removal of the historic water tower. However, if project activities uncover any item(s) that might be of archaeological, historical, or architectural interest, or if important new archaeological, historical, or architectural data should be encountered in the project APE, the applicant should make reasonable efforts to avoid further impacts to the property until an assessment can be made by an individual meeting the Secretary of the Interior's professional qualifications standards (36 CFR Part 61).

- The project will not have a significant adverse effect upon local ambient air quality provided the applicant takes reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property during the proposed project (567 IAC 23.3(2)"c").
- The project will not have a significant adverse effect upon local ambient noise levels, surface water quantity, groundwater quality or quantity, or water supply.
- No significant impact to surface water quality, shellfish, wildlife, or their natural habitats.

THEREFORE:

The above project conforms to the criteria in 567 Iowa Administrative Code 44.10(3) for drinking water relating to compliance with the National Environmental Policy Act of 1969. No adverse effect or significant environmental impact is foreseen at this time.

Karrie Darnell

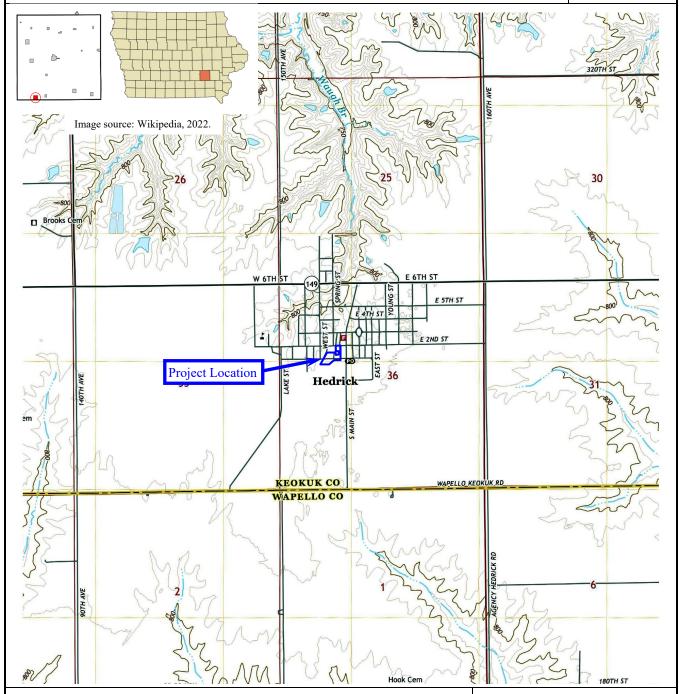
Environmental Review Specialist State Revolving Fund Iowa Department of Natural Resources

USGS 7.5 Minute Quadrangle: Hedrick **Section:** 36, **Township:** 74 N, **Range:** 13 W

Date: 1980 **Scale:** 1 Inch = 2,000 Feet



North



USGS Topographic Map

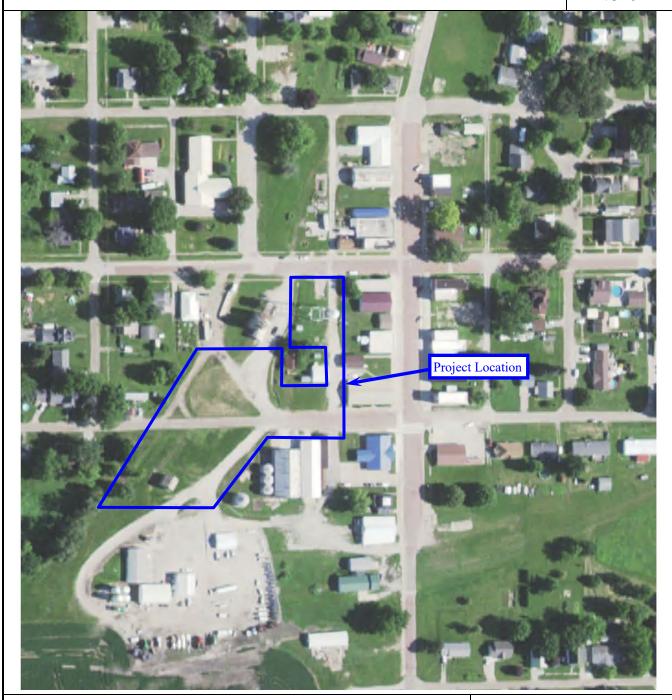
Hedrick Water Supply Infrastructure Upgrade Project Hedrick, IA



State Revolving Fund 502 East 9th Street Des Moines, IA 50319-0034 Location information provided by Garden & Associates, Ltd.



North



Aerial Photograph

Hedrick Water Supply Infrastructure Upgrade Project Hedrick, IA



State Revolving Fund 502 East 9th Street Des Moines, IA 50319-0034