



**CITY OF
CORPUS CHRISTI**

Environmental Assessment

**Determinations and Compliance Findings for HUD-Assisted Projects
24 CFR Part 58**

Greenwood WWTP Flood Mitigation & Backup Generator

February 2026

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Part 58 Environmental Assessment Form

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**U.S. Department of Housing and Urban
Development**

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

espanol.hud.gov

Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Greenwood WWTP Flood Mitigation & Backup Generator

Responsible Entity: City of Corpus Christi

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: 24-065-091-E767

Preparer: Tara Ducrest

Certifying Officer Name and Title: Paulette M. Guajardo, Mayor

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Hanson Professional Services Inc.

Direct Comments to: Mayor Paulette Guajardo
1201 Leopard Street
Corpus Christi, Texas 78401

Project Location: The project is at the Greenwood Wastewater Treatment Plant (WWTP), which is located at 6541 Greenwood Drive to the southwest of the intersection of Greenwood Drive and Saratoga Boulevard in Corpus Christi, Nueces County, Texas 78417. The WWTP is at 27.719271° north latitude and -97.457559° west longitude.

Description of the Proposed Project [24 CFR 50.21 & 58.32]:

Greenwood WWTP Flooding Mitigation:

The Greenwood WWTP has a maximum rated capacity of 8 million gallons per day (MGD). In the past decade, the Greenwood WWTP has experienced at least two (2) major flooding events that have caused damage to equipment, endangered personnel, inhibited the plant's ability to disinfect and meter the wastewater and caused wastewater outflows to La Volla Creek.

In September 2010, the plant had experienced the worst storm event in its history. Floodwaters came up to the headworks building and flooded the storage room. The water damaged Control Room No. 1 and flooded the UV disinfection equipment and caused damage to numerous equipment throughout the plant. During a major flooding event in April 2015, water flooded the digester pump room and overtopped the influent lift station wet well. While the operators were able to temporarily raise the ultra-violet (UV) disinfection system to prevent damage to the equipment, the plant was unable to maintain disinfection during the event. The flooding also affected several structures at the plant including the influent pump station, digester pump station, effluent screen structure, UV disinfection structure and reclaimed water pump station with high-water marks of up to 26.5 feet being observed at parts of the plant.

As a result of the plant flooding during storm events in the past, significant inflow and infiltration has occurred in the system, wastewater disinfection has been interrupted, and untreated outflows have been observed at La Volla Creek. In addition, since the plant influent lift station gets flooded, it leads to back-up in the collection system and the potential for sanitary sewer overflows (SSOs) increases in the areas surrounding the plant.

The purpose of this project is to mitigate potential flood damages to the Greenwood WWTP and allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. Under this project, measures are proposed to protect those structures that are most susceptible to flooding inside the plant along with interior drainage system improvements and grading improvements to collect stormwater from the critical areas within the plant that are prone to ponding in and around plant facilities. The major improvements include the following items:

- Site grading, piping and floodway improvements
- Flooding walls for identified plant structures
- A new effluent pump station (EPS) of firm capacity up to 36 MGD
- Miscellaneous improvements

Greenwood WWTP Emergency Generator:

The Greenwood WWTP currently meets the minimum power requirements set by TCEQ with dual power supply by AEP, however, there is no emergency generator for the plant to deal with the situation of grid electrical power outages.

The major improvements of this project components include:

- Installation of emergency generators
- Instrumentation and electrical control system for automatic switch between AEP power and emergency generators
- Miscellaneous improvements related to emergency generators

Statement of Purpose and Need for the Proposal: The purpose of this project is to mitigate potential flood damages to the Greenwood WWTP and allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. The service area of the Greenwood WWTP serves 64,336 people and it is the second largest wastewater plant in Corpus Christi. The flood mitigation measures and emergency generator

installation will benefit the citizens living in the Greenwood basin with a lower and moderate income (LMI) of **56.8%**.

Existing Conditions and Trends [24 CFR 58.40(a)]: The Greenwood WWTP is an existing WWTP that serves 64,336 people in Corpus Christi, Texas. The emergency generators will allow the WWTP to maintain operations during grid power outages. The flood mitigation improvements will allow the WWTP to maintain operations during flooding weather events such as hurricanes and tropical storms. If the project is not completed, potential impacts include more frequent sanitary sewer overflows.

Funding Information

Grant Number	HUD Program	Funding Amount
24-065-091-E767	CDBG-MIT	\$8,432,420.00

Estimated Total HUD Funded Amount: \$8,432,420.00

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$15,009,611.00

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Based on the DOD Accident Potential Zone Guidelines in 32 CFR 256.7 and 256.8 the project is located in an accident potential zone of a runway located at the U.S. Navy Cabaniss Field Naval Outlying Field (NOLF) and the project is in conformance with DOD guidelines for utilities located in accident potential zones. In addition, a site-specific study titled NOLF Cabaniss and NOLF Waldron – Air Installations Compatible Use Zones (AICUZ) Study shows that the Greenwood WWTP is not located in the clear zone or accident potential zones of NOLF Cabaniss. The DOD guidelines and the Accident Potential Zone map from the site-specific study are provided as Attachment A.

<p>Coastal Barrier Resources</p> <p>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project is not located in a CBRS unit. A map from the U.S. Fish & Wildlife Service Coastal Barrier Resources System Mapper is provided as Attachment B.</p>
<p>Flood Insurance</p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The west portion of the project area is located in Zone AE-Floodway and the east portion is located in Zone AE-an area subject to the 1-percent annual chance (100-year) flood and Zone X (shaded)-an area subject to the 0.2-percent annual chance (500-year) flood. The project includes improvements to mitigate potential flood damage to the WWTP. Flood insurance coverage will be provided for the emergency generators. A FEMA Flood Insurance Rate Map (FIRM) and an insurance certificate for the Greenwood WWTP are included as Attachment C.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5</p>		
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>New construction at the existing WWTP will include installation of new emergency generators; site grading, piping, and floodway improvements; and construction of flood walls for some plant structures. The project area is in Nueces County, which is in attainment status. A current list of all non-attainment areas, which does not include Nueces County, is included as Attachment D.</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>A Consistency with the Texas Coastal Management Program form was submitted to the Texas General Land Office (GLO) to determine consistency of the project with the Texas Coastal Management Program. GLO responded that the GLO Coastal Management Program does not currently have any listed federal financial assistance activities, so a federal consistency review is not required. The submitted form and correspondence received from GLO is included as Attachment E.</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The use of the project area as a wastewater treatment plant (WWTP) was identified as a potential REC in the Phase I Environmental Site Assessment (ESA) prepared for the site; however, due to the continuing use of the project area as a WWTP, additional assessment was not recommended until the WWTP is decommissioned. Toxic and hazardous substances are stored and used in the project area, consistent with the use of the property as a WWTP. The narrative portion of the Phase I ESA is included as Attachment F.</p>

<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The U.S. Fish & Wildlife Service Information for Planning and Consultation (IPAC) website was used to determine if federally listed species or designated critical habitats were present in the project area. An official species list, biological analysis, and a determination letter for the Tricolored bat are included as Attachment G. The IPAC documentation shows that there is no critical habitat in the project area and that no effects are anticipated for any listed species.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project involves installing emergency generators with secondary containment at the Greenwood Wastewater Treatment Plant. The HUD Acceptable Separation Distance Assessment Tool was used to determine the acceptable separation distance between the emergency generator fuel tank and nearby buildings and areas of congregation. No residences or other facilities where people may congregate are present within the acceptable separation distances of 103 feet for thermal radiation for people and 17 feet for thermal radiation for buildings. The acceptable separation distance calculations and a map showing that there are no facilities or areas of congregation within the acceptable distances are included as Attachment H.</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project area is within the boundaries of an existing wastewater treatment plant and no farmland will be impacted.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The project involves installation of emergency generators and completion of flood mitigation improvements at the Greenwood WWTP in Corpus Christi, Nueces County, Texas. The emergency generators will be installed out of the floodway. Some flood mitigation improvements will occur in the floodway. Based on the project including a critical action and using the base flood elevation plus three feet as the FFRMS, the FFRMS will be 31 feet. This was determined by reviewing the Nueces County Flood Insurance Study (FIS), effective date October 13, 2022. The flood profile from the FIS for Oso Creek Tributary No. 10, which is immediately west of the WWTP is included as Attachment I. The 8-Step Process applies to this project. Mitigation measures will include site grading, piping and floodway improvements; flooding walls for identified plant structures; a new effluent pump station (EPS) of firm capacity up to 36 MGD; and miscellaneous improvements. Documentation of the 8-Step Process is included in Attachment I.</p>

<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The activities that will occur for the project are included in a list of activities not requiring review by SHPO in a Programmatic Agreement (PA) between the Texas Historical Commission and the Texas General Land Office. The PA is provided as Attachment J.</p> <p>The Apache Tribe of Oklahoma, the Comanche Nation, Oklahoma, the Tonkawa Tribe of Oklahoma, and the Wichita and Affiliated Tribes were sent consultation letters on 2/12/2026. Tribal consultation correspondence is provided as Attachment K.</p> <p>The Texas Historical Commission (THC) Atlas identified no historic sites on or near the project area. A THC map is provided as Attachment L.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project does not involve new construction for residential use, rehabilitation of an existing residential property, or a research demonstration project and is therefore in compliance with the noise regulations of 24 CFR Part 51, Subpart B.</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project area is not located on a sole source aquifer. A map showing the nearest sole source aquifer and the project area is provided as Attachment M.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project will not impact a wetland in terms Executive Order 11990. A National Wetlands Inventory Map of the project area is included as Attachment N.</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project area is not within proximity of a NWSRS river. A map showing the nearest NWSRS river is included as Attachment O.</p>

Environmental Assessment Factors [24 CFR 58.40] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	(2) No impact anticipated	The project area is zoned RS-6 (single-family, with 6 units per lot). Based on the City of Corpus Christi’s Unified Development Code, utilities are permitted in zone RS-6, subject to limitations and wastewater utilities are listed as being exempt. The project will not change the land use of the project area. The site will continue to be a wastewater treatment plant. A zoning map and zoning information from the Unified Development Code are provided as Attachment P.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	(1) Minor beneficial impact	<p>Soils of the project area consist of Victoria clay (1 to 3 percent slopes). Drainage class for Victoria clay in this location is well drained and soils in this group have moderately high runoff potential when thoroughly wet. Water transmission through Victoria clay is somewhat restricted. Soils of the project area have been suitable for the existing WWTP and are expected to be suitable for the new emergency generators and flooding mitigation activities. A soil report from the Natural Resources Conservation Service is provided as Attachment Q.</p> <p>The project area is relatively flat, with gentle sloping towards La Volla Creek. The flooding mitigation improvements will include site grading, piping installation, floodway improvements, flood wall installation for some WWTP structures, construction of a new effluent pump station, and other miscellaneous improvements. A topographic map is provided as Attachment R.</p> <p>In non-paved portions of the project area, vegetation is established and erosion is not occurring. Ground disturbances made during the flood mitigation portion of the project will be permanently stabilized following construction.</p> <p>Stormwater is generally sheet flow runoff that flows towards La Volla Creek. Measures are proposed to protect the structures most susceptible to flooding and to improve the plant drainage system. Grading improvements are planned to collect stormwater from critical areas within the plant that are prone to flooding.</p>

Hazards and Nuisances including Site Safety and Noise	(2) No impact anticipated	<p>The project is being conducted to address a natural hazard of flooding that occurs during extreme weather events such as hurricanes and tropical storms.</p> <p>Construction activities have the potential to expose sensitive receptors to noise emissions that are normally unacceptable. There are no sensitive receptors in close proximity to the project area and the City of Corpus Christi has a noise ordinance that limits construction hours to between 7:00 am and 8:00 pm. A copy of the ordinance is included as Attachment S.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	(2) No impact anticipated	The project activities are limited to improvements to an existing WWTP and are not expected to impact employment or income patterns.
Demographic Character Changes, Displacement	(2) No impact anticipated	The project activities are limited to improvements to an existing WWTP and are not expected to impact demographic character or displace any residents.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	(2) No impact anticipated	The project is not anticipated to impact educational or cultural facilities because the project activities are limited to improvements to an existing WWTP.
Commercial Facilities	(2) No impact anticipated	The project is not anticipated to impact commercial facilities because the project activities are limited to improvements to an existing WWTP.
Health Care and Social Services	(2) No impact anticipated	The project is not anticipated to impact healthcare or social services because the project activities are limited to improvements to an existing WWTP.
Solid Waste Disposal / Recycling	(2) No impact anticipated	Solid waste generated during construction activities will need to be managed to avoid a negative impact. Solid waste disposal and recycling services are provided to the existing WWTP.
Waste Water / Sanitary Sewers	(1) Minor beneficial impact	The project is occurring at an existing WWTP. The emergency generators being installed and the flood mitigation improvements being made will improve the operation of the WWTP.
Water Supply	(2) No impact anticipated	The project is not anticipated to impact water supply because the project activities are limited to improvements to an existing WWTP.
Public Safety - Police, Fire and Emergency Medical	(2) No impact anticipated	The project is not anticipated to impact public safety services because the project activities are limited to improvements to an existing WWTP.

Parks, Open Space and Recreation	(2) No impact anticipated	The project is not anticipated to impact parks, open spaces, or recreation options because the project activities are limited to improvements to an existing WWTP.
Transportation and Accessibility	(2) No impact anticipated	The project is not anticipated to impact transportation or accessibility because the project activities are limited to improvements to an existing WWTP.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	(2) No impact anticipated	No unique natural features or water resources are located on or near the project area. La Volla Creek is located to the west of the project area and a stormwater pollution prevention plan will be implemented for the construction project.
Vegetation, Wildlife	(2) No impact anticipated	The project is located at a previously developed WWTP, with only maintained grass and a few landscaped trees. Disturbed ground will be returned to maintained grass following completion of construction.
Other Factors	(2) No impact anticipated	No other natural features are anticipated to be impacted by the project because the project activities are limited to improvements to an existing WWTP.

Environmental Assessment Factor	Impact Code	Impact Evaluation
ENERGY		
Energy Efficiency	(1) Minor beneficial impact	The project involves installing emergency generators at an existing WWTP, which will allow the plant to operate during grid electrical power outages.

Additional Studies Performed: Phase I Environmental Site Assessment – Greenwood Wastewater Treatment Plant

Field Inspection (Date and completed by): A field inspection of the project area was completed on September 16, 2025 by Tara Ducrest, with Hanson Professional Services Inc., and William Causey, with the City of Corpus Christi. A photo log is provided as Attachment T.

List of Sources, Agencies and Persons Consulted:

- HUD Exchange - <https://www.hudexchange.info/programs/environmental-review/>
- 32 CFR § 256.9 - <https://www.govinfo.gov/content/pkg/CFR-2011-title32-vol2/pdf/CFR-2011-title32-vol2-sec256-8.pdf>
- NOLF Cabaniss and NOLF Waldron Air Installations Compatible Use Zones (AICUZ) Study - <https://www.corpuschristitx.gov/media/zbrneu53/us-navys-air-installation-compatibility-use-zones.pdf>

- U.S. Fish and Wildlife Service Coastal Barrier Resources System Mapper - <https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/>
- Federal Emergency Management Agency Flood Map Service Center - <https://msc.fema.gov/portal/home>
- U.S. Environmental Protection Agency Current Nonattainment Counties for All Criteria Pollutants - <https://www3.epa.gov/airquality/greenbook/ancl.html#TX>
- Texas Coastal Management Program Federal Consistency Guidance - <https://www.glo.texas.gov/sites/default/files/resources/glo/coast/coastal-management/federal-consistency/files/federal-consistency-interim-guidance.pdf>
- Phase I Environmental Site Assessment – Greenwood Wastewater Treatment Plant, 6541 Greenwood Drive, Corpus Christi, Nueces County, Texas, November 2025
- U.S. Fish and Wildlife Served Information for Planning and Consultation (IPaC) - <https://ipac.ecosphere.fws.gov/user/login>
- HUD Acceptable Separation Distance Electronic Assessment Tool - <https://www.hudexchange.info/programs/environmental-review/asd-calculator/>
- Flood Damage Prevention Ordinance of Nueces County - <https://www.nuecesco.com/home/showpublisheddocument/30900/638369424449770000>
- Flood Insurance Study – Nueces County, Texas, and Incorporated Areas, Volume 2 of 3 - <https://map1.msc.fema.gov/mipdata/48355CV002A.pdf?LOC=6deeb23be73b8527c271fc686927f192>
- Programmatic Agreement between the Texas Historical Commission and the Texas General Land Office GLO Contract No. 12-400-000-6445 - <https://www.hudexchange.info/sites/onecpd/assets/File/TX-CDBG-DR-2013-PA-Section-106.pdf>
- HUD Tribal Directory Assessment Tool - <https://egis.hud.gov/tadat/>
- Texas Historical Commission Atlas - <https://atlas.thc.texas.gov/Map>
- Sole Source Aquifer Map - <https://experience.arcgis.com/experience/1bfab371d71e4b868fc9ae7df62a16fe>
- National Wetlands Inventory Map - <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>
- National Wild and Scenic River System Map - <https://rivers.gov/carp/map>
- City of Corpus Christi Zoning Map - <https://gis-corpus.opendata.arcgis.com/datasets/zoning/explore>
- City of Corpus Christi Unified Development Code - <https://online.encodeplus.com/regs/corpuschristi-tx/index.aspx>
- Natural Resources Conservation Service - <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>
- United States Geological Survey Topographic Map - <https://store.usgs.gov/map-locator>
- City of Corpus Christi Code of Ordinances - https://library.municode.com/tx/corpus_christi/codes/code_of_ordinances
- Agency contacted: Texas General Land Office contacted for consistency determination of project with the Texas Coastal Management Program. Consistency determination form sent to federal.consistency@glo.texas.gov

- Tribes contacted: The Apache Tribe of Oklahoma, the Comanche Nation, Oklahoma, the Tonkawa Tribe of Oklahoma, and the Wichita and Affiliated Tribes were sent consultation letters on 2/12/2026.

List of Permits Obtained:

Potential permits to be obtained for the project include a floodplain development permit and a construction stormwater permit.

Public Outreach [24 CFR 50.23 & 58.43]:

- 8/14/2025 – Citizen Participation and Civil Rights Notices Regarding CDBG-MIT Grant to City of Corpus Christi for Greenwood and Oso Wastewater Treatment Plant Improvements posted on City of Corpus Christi website (<https://www.corpuschristitx.gov/media/si4a0dqf/public-noticecitizen-participation-and-civil-rights-notices-regarding-cdbg-mit-grant-20250814.pdf>)
- 8/28/2025 – Wastewater Infrastructure Improvements News Release posted on City of Corpus Christi website (<https://www.corpuschristitx.gov/news/posts/news-release-8-28-25-city-awarded-151-million-for-wastewater-infrastructure-improvements/>)
- 1/23/2026 – Published Early Notice and Public Review of a Proposed Activity in a Federal Flood Risk Management Standard Designated Floodplain on City of Corpus Christi website in English (<https://www.corpuschristitx.gov/media/v14iktyd/early-floodplain-public-notice-english.pdf>) and Spanish (<https://www.corpuschristitx.gov/media/2vvmv01z/early-floodplain-public-notice-spanish.pdf>)
- 2/16/2026 – Published Final Notice and Public Explanation of a Proposed Activity in a Federal Flood Risk Management Standard (FFRMS) Designated Floodplain on City of Corpus Christi website in English (<https://www.corpuschristitx.gov/media/z1vhbh43/final-floodplain-public-notice-english-signed-02-16-2026.pdf>) and Spanish (<https://www.corpuschristitx.gov/media/zwblwutf/final-floodplain-public-notice-spanish-signed-02-16-2026.pdf>)
- 3/28/2026 – Combined Notice of Finding of No Significant Impact and Notice of Intent to Request a Release of Funds planned to be published on City of Corpus Christi website

A copy of public notices posted on the City of Corpus Christi’s website are included as Attachment U.

Cumulative Impact Analysis [24 CFR 58.32]:

The project activities are limited to improvements to an existing WWTP and will not have cumulative impacts.

Alternatives [24 CFR 58.40(e)]

Options considered include Option A, “Greenwood WWTP Flood Mitigation & Backup Generators,” and Option B, “No Action Alternative.” An alternative site was not considered because the work is occurring at an existing WWTP.

No Action Alternative [24 CFR 58.40(e)]:

Under Option B, the “No Action Alternative,” the City of Corpus Christi would not complete the flood mitigation improvements to the Greenwood WWTP. The WWTP would continue to experience flooding and potentially impact water quality from sanitary sewer overflows.

Airport Hazards Worksheet

Airport Hazards (CEST and EA)

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D
References		
https://www.hudexchange.info/environmental-review/airport-hazards		

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*

Yes → *Continue to Question 2.*

2. Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?

Yes, project is in an APZ → *Continue to Question 3.*

Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*

No, project is not within an APZ or RPZ/CZ

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

3. Is the project in conformance with DOD guidelines for APZ?

Yes, project is consistent with DOD guidelines without further action.

Explain how you determined that the project is consistent:

The project is within the APZ of the NOLF Cabaniss based on the DOD Accident Potential Zone Guidelines in 32 CFR 256.7 and 256.8. The guidelines state that utilities are compatible land uses for accident potential zones.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

No, the project cannot be brought into conformance with DOD guidelines and has not been approved. → *Project cannot proceed at this location.*

Project is not consistent with DOD guidelines, but it has been approved by Certifying Officer or HUD Approving Official.

Explain approval process:

If mitigation measures have been or will be taken, explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Based on the DOD Accident Potential Zone Guidelines in 32 CFR 256.7 and 256.8 the project is located in an accident potential zone of a runway located at the U.S. Navy Cabaniss Field Naval Outlying Field and the project is in conformance with DOD guidelines for utilities located in accident potential zones. In addition, a site-specific study titled NOLF Cabaniss and NOLF Waldron – Air Installations Compatible Use Zones (AICUZ) Study shows that the Greenwood WWTP is not located in the clear zone or accident potential zones of NOLF Cabaniss. The DOD guidelines and the Accident Potential Zone map from the site-specific study are provided as Attachment A.

Are formal compliance steps or mitigation required?

Yes

No

Coastal Barrier Resources Worksheet

Coastal Barrier Resources (CEST and EA)

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	
References		
https://www.hudexchange.info/environmental-review/coastal-barrier-resources		

Projects located in the following states must complete this form.

Alabama	Georgia	Massachusetts	New Jersey	Puerto Rico	Virgin Islands
Connecticut	Louisiana	Michigan	New York	Rhode Island	Virginia
Delaware	Maine	Minnesota	North Carolina	South Carolina	Wisconsin
Florida	Maryland	Mississippi	Ohio	Texas	

1. Is the project located in a CBRS Unit?

- No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a CBRS Unit.*
- Yes → *Continue to Question 2.*

Federal assistance for most activities may not be used at this location. You must either choose an alternate site or cancel the project. In very rare cases, federal monies can be spent within CBRS units for certain exempted activities (e.g., a nature trail), after consultation with the Fish and Wildlife Service (FWS) (see [16 USC 3505](#) for exceptions to limitations on expenditures).

2. Indicate your selected course of action.

- After consultation with the FWS the project was given approval to continue
→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map and documentation of a FWS approval.*
- Project was not given approval
Project cannot proceed at this location.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project is not located in a CBRS unit. A map from the U.S. Fish & Wildlife Service Coastal Barrier Resources System Mapper is provided as Attachment B.

Are formal compliance steps or mitigation required?

Yes

No

Flood Insurance Worksheet

Flood Insurance (CEST and EA)

General requirements	Legislation	Regulation	Reference
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.5.	Flood Insurance - HUD Exchange

1. Does this project involve mortgage insurance, refinance, acquisition, repairs, construction, or rehabilitation of a structure, mobile home, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.
Continue to the Worksheet Summary.

Yes *Continue to Question 2.*

2. Provide a FEMA/FIRM map showing the site.

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

No *Continue to the Worksheet Summary.*

Yes *Continue to Question 3.*

3. Is the community participating in the National Flood Insurance Program or has less than one year passed since FEMA notification of Special Flood Hazards?

Yes, the community is participating in the National Flood Insurance Program.

For loans, loan insurance or loan guarantees, flood insurance coverage must be continued for the term of the loan. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less. Provide a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance.

Continue to the Worksheet Summary.

- Yes, less than one year has passed since FEMA notification of Special Flood Hazards.
If less than one year has passed since notification of Special Flood Hazards, no flood insurance is required.

Continue to the Worksheet Summary.

- No. The community is not participating, or its participation has been suspended.
Federal assistance may not be used at this location. Cancel the project at this location.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The west portion of the project area is located in Zone AE-Floodway and the east portion is located in Zone AE-an area subject to the 1-percent annual chance (100-year) flood and Zone X (shaded)-an area subject to the 0.2-percent annual chance (500-year) flood. The project includes improvements to mitigate potential flood damage to the WWTP. Flood insurance coverage will be provided for the emergency generators. A FEMA Flood Insurance Rate Map (FIRM) and an insurance certificate for the Greenwood WWTP are included as Attachment C.

Clean Air Act Worksheet

Air Quality (CEST and EA)

General Requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93
Reference		
https://www.hudexchange.info/environmental-review/air-quality		

Scope of Work

- 1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?**

Yes

→ Continue to Question 2.

No

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Air Quality Attainment Status of Project's County or Air Quality Management District

- 2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?**

Follow the link below to determine compliance status of project county or air quality management district:

<http://www.epa.gov/oaqps001/greenbk/>

No, project's county or air quality management district is in attainment status for all criteria pollutants

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Yes, project's management district or county is in non-attainment or maintenance status for one or more criteria pollutants.

Describe the findings:

→ Continue to Question 3.

3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Explain how you determined that the project would not exceed de minimis or threshold emissions.*

Yes, the project exceeds *de minimis* emissions levels or screening levels.

→ *Continue to Question 4. Explain how you determined that the project would not exceed de minimis or threshold emissions in the Worksheet Summary.*

4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

New construction at the existing WWTP will include installation of new emergency generators; site grading, piping, and floodway improvements; and construction of flood walls for some plant structures. The project area is in Nueces County, which is in attainment status. A current list of all non-attainment areas, which does not include Nueces County, is included as Attachment D.

Are formal compliance steps or mitigation required?

Yes

No

Coastal Zone Management Worksheet

Coastal Zone Management Act (CEST and EA)

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930
References		
https://www.onecpd.info/environmental-review/coastal-zone-management		

Projects located in the following states must complete this form.

Alabama	Florida	Louisiana	Mississippi	Ohio	Texas
Alaska	Georgia	Maine	New Hampshire	Oregon	Virgin Islands
American Samona	Guam	Maryland	New Jersey	Pennsylvania	Virginia
California	Hawaii	Massachusetts	New York	Puerto Rico	Washington
Connecticut	Illinois	Michigan	North Carolina	Rhode Island	Wisconsin
Delaware	Indiana	Minnesota	Northern Mariana Islands	South Carolina	

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

Yes → *Continue to Question 2.*

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a Coastal Zone.*

2. Does this project include activities that are subject to state review?

Yes → *Continue to Question 3.*

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.*

3. Has this project been determined to be consistent with the State Coastal Management Program?

Yes, with mitigation. → *Continue to Question 4.*

Yes, without mitigation. → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.*

No, project must be canceled.

Project cannot proceed at this location.

4. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the State Coastal Management Program letter of consistency) and any other documentation used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

A Consistency with the Texas Coastal Management Program form was submitted to the Texas General Land Office (GLO) to determine consistency of the project with the Texas Coastal Management Program. GLO responded that the GLO Coastal Management Program does not currently have any listed federal financial assistance activities, so a federal consistency review is not required. The submitted form and correspondence received from GLO are included as Attachment E.

Are formal compliance steps or mitigation required?

Yes

No

Contamination and Toxic Substances Worksheet

Contamination and Toxic Substances (Multifamily and Non-Residential Properties)

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
https://www.hudexchange.info/programs/environmental-review/site-contamination		

1. How was site contamination evaluated? ¹ Select all that apply.

- ASTM Phase I ESA
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the above

→ Provide documentation and reports and include an explanation of how site contamination was evaluated in the Worksheet Summary.

Continue to Question 2.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

- No

Explain:

The use of the project area as a wastewater treatment plant (WWTP) was identified as a potential REC in the Phase I ESA prepared for the site; however, due to the continuing use of the project area as a WWTP, additional assessment was not recommended until the WWTP is decommissioned. Toxic and hazardous substances are stored and used in the project area, consistent with the use of the property as a WWTP.

¹ HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

→ Based on the response, the review is in compliance with this section.
Continue to the Worksheet Summary below.

Yes.

→ Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 3.

3. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental effects cannot be mitigated, then HUD assistance may not be used for the project at this site.

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated

→ Project cannot proceed at this location.

Yes, adverse environmental impacts can be eliminated through mitigation.

→ Provide all mitigation requirements² and documents. Continue to Question 4.

4. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls³, or use of institutional controls⁴.

² Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

³ Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

⁴ Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

If a remediation plan or clean-up program was necessary, which standard does it follow?

Complete removal

→ *Continue to the Worksheet Summary.*

Risk-based corrective action (RBCA)

→ *Continue to the Worksheet Summary.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The Greenwood WWTP has been in operation since 1957. Wastewater treatment and sludge management have occurred at the WWTP. This site could potentially be a recognized environmental condition due to the possible presence of contamination from metals, Polychlorinated Biphenyls (PCBs), and Per- and Polyfluoroalkyl Substances (PFAS). Due to the site being an active wastewater treatment plant, additional investigation is not currently recommended. In the event that the Greenwood WWTP were to be decommissioned, assessment for potential contamination of the property would be recommended. The narrative portion of the Phase I ESA is included as Attachment F.

Are formal compliance steps or mitigation required?

Yes

No

Endangered Species Worksheet

Endangered Species Act (CEST and EA)

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402
References		
https://www.hudexchange.info/environmental-review/endangered-species		

1. Does the project involve any activities that have the potential to affect species or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.
 → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office.
 Explain your determination:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

Yes, the activities involved in the project have the potential to affect species and/or habitats. → *Continue to Question 2.*

2. Are federally listed species or designated critical habitats present in the action area?

Obtain a list of protected species from the Services. This information is available on the [FWS Website](#) or you may contact your [local FWS](#) and/or [NMFS](#) offices directly.

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation*

may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.

Yes, there are federally listed species or designated critical habitats present in the action area. → *Continue to Question 3.*

3. What effects, if any, will your project have on federally listed species or designated critical habitat?

No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate.*

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

→ *Continue to Question 4, Informal Consultation.*

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

→ *Continue to Question 5, Formal Consultation.*

4. Informal Consultation is required

Section 7 of ESA (16 USC. 1536) mandates consultation to resolve potential impacts to endangered and threatened species and critical habitats. If a HUD-assisted project may affect any federally listed endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

Did the Service(s) concur with the finding that the project is Not Likely to Adversely Affect?

Yes, the Service(s) concurred with the finding.

→ *Based on the response, the review is in compliance with this section. Continue to Question 6 and provide the following:*

- (1) A biological evaluation or equivalent document*
- (2) Concurrence(s) from FWS and/or NMFS*
- (3) Any other documentation of informal consultation*

Exception: If finding was made based on procedures provided by a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office, provide whatever documentation is mandated by that agreement.

No, the Service(s) did not concur with the finding. → Continue to Question 5.

5. Formal consultation is required

Section 7 of ESA (16 USC 1536) mandates consultation to resolve potential impacts to federally listed endangered and threatened species and critical habitats. If a HUD assisted project may affect any endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

→ Once consultation is complete, the review is in compliance with this section. Continue to Question 6 and provide the following:

- (1) A biological assessment, evaluation, or equivalent document
- (2) Biological opinion(s) issued by FWS and/or NMFS
- (3) Any other documentation of formal consultation

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the proposed measures that will be implemented to mitigate for the impact or effect, including the timeline for implementation.

Mitigation as follows will be implemented:

No mitigation is necessary.

Explain why mitigation will not be made here:

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The U.S. Fish & Wildlife Service Information for Planning and Consultation (IPAC) website was used to determine if federally listed species or designated critical habitats were present in the project area. An official species list, biological analysis, and a determination letter for the Tricolored bat are included as Attachment G. The IPAC documentation shows that there is no critical habitat in the project area and that no effects are anticipated for any listed species.

Are formal compliance steps or mitigation required?

Yes

No

Explosive and Flammable Hazards Worksheet

Explosive and Flammable Hazards (CEST and EA)

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C
Reference		
https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities		

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

→ Continue to Question 2.

Yes

Explain:

The project involves installing emergency generators which store diesel fuel at the Greenwood Wastewater Treatment Plant.

→ Go directly to Question 5.

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes

→ Continue to Question 3.

3. Within 1 mile of the project site, are there any current *or planned* stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer “no.” For any other type of aboveground storage container within the search area that holds one of the

flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer “yes.”

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide all documents used to make your determination.

Yes

→ Continue to Question 4.

4. Visit HUD’s website to identify the appropriate tank or tanks to assess and to calculate the required separation distance using the [electronic assessment tool](#). To document this step in the analysis, please attach the following supporting documents to this screen:

- Map identifying the tank selected for assessment, and showing the distance from the tank to the proposed HUD-assisted project site; and
- Electronic assessment tool calculation of the required separation distance.

Based on the analysis, is the proposed HUD-assisted project site located at or beyond the required separation distance from all covered tanks?

Yes

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

No

→ Go directly to Question 6.

5. Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?

Please visit HUD’s website for information on calculating Acceptable Separation Distance.

Yes

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

No

→ Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.
Continue to Question 6.

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Mitigation measures may include both natural and manmade barriers, modification of the project design, burial or removal of the hazard, or other engineered solutions. Describe selected mitigation measures, including the timeline for implementation, and attach an implementation plan. If negative effects cannot be mitigated, cancel the project at this location.

Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project involves installing emergency generators with secondary containment at the Greenwood Wastewater Treatment Plant. The HUD Acceptable Separation Distance Assessment Tool was used to determine the acceptable separation distance between the emergency generator fuel tank and nearby buildings and areas of congregation. No residences or other facilities where people may congregate are present within the acceptable separation distances of 103 feet for thermal radiation for people and 17 feet for thermal radiation for buildings. The acceptable separation distance calculations and a map showing that there are no facilities or areas of congregation within the acceptable distances are included as Attachment H.

Are formal compliance steps or mitigation required?

- Yes
- No

Farmlands Protection Worksheet

Farmlands Protection (CEST and EA)

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658
Reference		
https://www.hudexchange.info/environmental-review/farmlands-protection		

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

- Yes
 No

Explain how you determined that agricultural land would not be converted:

The project area is within the boundary of an existing wastewater treatment plant.

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting your determination.

2. Does your project meet one of the following exemptions?

- Project on land already in or committed to urban development or used for water storage ([7 CFR 658.2\(a\)](#)). To check whether the project location is located in an urbanized area, use the following US Census Bureau application: [TIGERweb](#)
 - Construction limited to on-farm structures needed for farm operations
 - Construction is limited to new minor secondary (accessory) structures such as a garage or storage shed
- Yes → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination
- No → Continue to Question 3.

3. Does “important farmland,” including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site?

You may use the links below to determine important farmland occurs on the project site:

- Utilize USDA Natural Resources Conservation Service’s (NRCS) Web Soil Survey <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>
- Check with your city or county’s planning department and ask them to document if the project is on land regulated by the FPPA (zoning important farmland as non-agricultural does not exempt it from FPPA requirements)
- Contact NRCS at the local USDA service center <http://offices.sc.egov.usda.gov/locator/app?agency=nrcs> or your NRCS state soil scientist http://soils.usda.gov/contact/state_offices/ for assistance

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

Yes → *Continue to Question 4.*

4. Consider alternatives to completing the project on important farmland and means of avoiding impacts to important farmland.

- Complete form **AD-1006**, “Farmland Conversion Impact Rating” http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045394.pdf and contact the state soil scientist before sending it to the local NRCS District Conservationist.
(NOTE: for corridor type projects, use instead form **NRCS-CPA-106**, “Farmland Conversion Impact Rating for Corridor Type Projects: http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045395.pdf.)
- Work with NRCS to minimize the impact of the project on the protected farmland. When you have finished with your analysis, return a copy of form AD-1006 (or form NRCS-CPA-106 if applicable) to the USDA-NRCS State Soil Scientist or his/her designee informing them of your determination.

Document your conclusion:

Project will proceed with mitigation.

Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

Project will proceed without mitigation.

Explain why mitigation will not be made here:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project area is within the boundary of an existing wastewater treatment plant.

Are formal compliance steps or mitigation required?

- Yes
- No

Floodplain Management Worksheet

Floodplain Management (CEST and EA)

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 Executive Order 13690 42 USC <u>4001-4128</u> 42 USC 5154a	24 CFR 55

Reference

<https://www.hudexchange.info/environmental-review/floodplain-management>

1. Does this project meet an exemption at [24 CFR 55.12](#) from compliance with HUD's floodplain management regulations in Part 55 or utilize the delayed compliance date for certain Office of Housing programs?

Yes

Select the applicable citation at [24 CFR 55.12](#) and provide supporting documentation for the determination if applicable.

- a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b)
- b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19
- c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is placed on the property's continued use for flood control, wetland protection, open space, or park land, but only if:
- (1) The property is cleared of all existing buildings and walled structures; and
 - (2) The property is cleared of related improvements except those which:
 - (i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);
 - (ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and
 - (iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.
- d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance, or other HUD assistance
- e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions
- f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland;

- g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if:
 - (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and
 - (2) the proposed project will not result in any new construction in or modifications of a wetland
- h) Issuance or use of Housing Vouchers or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies)
- i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes. Office of Housing programs utilizing the January 1, 2025 compliance date. These reviews must comply with the 2013 version of the Part 55 regulations. Continue to Worksheet Summary for 2013 version to upload supporting documentation.

No. *Continue to Question 2.*

2. Does the project include a Critical Action?

The project area is a wastewater treatment plant that serves 64,336 people.

Yes. Describe the Critical Action. Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants. Continue to Question 4.

No. Continue to Question 3.

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination.

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information to determine flood elevation. Include documentation and an explanation of why this

is the best available information for the site. Note that newly constructed and substantially improved structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or—if available—a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

a. Does your project occur in the FFRMS floodplain?

Yes, continue to part b.

No. Review for floodplain management is complete.

b. Is your project located in any of the floodplain categories below? Select all that apply. If none apply, continue to question 7.

Floodway: *Continue to Question 5. Floodways.*

Coastal High Hazard Area (V Zone) or Limit of Moderate Wave Action (LiMWA): *Continue to Question 6. Coastal High Hazard Areas and LiMWAs.*

4. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination.

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), or the higher of the 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information to determine flood elevation. Note that newly constructed and substantially improved structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Utilize CISA to determine the FFRMS floodplain for critical actions

CISA for Critical Actions. If using a local tool, ensure that the FFRMS elevation provided is higher than the 0.2 PFA or 3' above the base flood elevation.

OR;

Choose the higher of 0.2 PFA or FVA elevations

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

FVA. For critical actions, the FFRMS floodplain is the area that results from adding three feet to the base flood elevation as established by the effective FEMA FIRM or FIS or—if available—a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

a. Does your project occur in the FFRMS floodplain?

Yes, continue to part b.

No. Review for floodplain management is complete.

b. Is your project located in any of the floodplain categories below? Select all that apply. If none apply, continue to question 7.

Floodway: *Continue to Question 5. Floodways.*

Coastal High Hazard Area (V Zone) or LiMWA: *Continue to Question 6. Coastal High Hazard Areas and LiMWAs.*

5. Floodways

Do the floodway exemptions at [55.8](#) or [55.21](#) apply?

Yes

The 8-Step Process is required. Document mitigation measures necessary to meet the requirements in 55.8 or 55.21. Provide a completed 8-Step Process, including the early public notice and the final notice.

Continue to Question 7. 8-Step Process.

No

Federal assistance may not be used at this location. You must either choose an alternate site or cancel the project at this location.

6. Coastal High Hazard Area (V Zone) and LiMWAs

Do the exemptions at [55.8](#) or [55.21](#) apply?

Yes

The 8-Step Process is required. Document mitigation measures necessary to meet the requirements in 55.8 or 55.21. Provide a completed 8-Step Process, including the early public notice and the final notice.

Continue to Question 7. 8-Step Process.

No

Federal assistance may not be used at this location. You must either choose an alternate site or cancel the project at this location.

7. 8-Step Process.

Does the 8-Step Process apply? Select one of the following options:

8-Step Process is inapplicable per 55.13.

Select the applicable citation:

- (a) HUD's mortgage insurance actions and other financial assistance for the purchasing, mortgaging, or refinancing of existing one- to four-family properties in communities that are in the Regular Program of the NFIP and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24), where the action is not a critical action and the property is not located in a floodway, coastal high hazard area, or LIMWA;
- (b) Financial assistance for minor repairs or improvements on one- to four-family properties that do not meet the thresholds for "substantial improvement" under § 55.2(b)(12);
- (c) HUD or a recipient's actions involving the disposition of individual HUD or recipient held, one- to four-family properties;
- (d) HUD guarantees under the Loan Guarantee Recovery Fund Program (24 CFR part 573), where any new construction or rehabilitation financed by the existing loan or mortgage has been completed prior to the filing of an application under the program, and the refinancing will not allow further construction or rehabilitation, nor result in any physical impacts or changes except for routine maintenance;
- (e) The approval of financial assistance to lease units within an existing structure located within the floodplain, but only if;
 - (1) The structure is located outside the floodway or coastal high hazard area, and is in a community that is in the Regular Program of the NFIP and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24); and
 - (2) The project is not a critical action; and
 - (3) The entire structure is or will be fully insured or insured to the maximum extent available under the NFIP for at least the term of the lease.
- (f) Special projects for the purpose of improving efficiency of utilities or installing renewable energy that involve the repair, rehabilitation, modernization, weatherization, or improvement of existing structures or infrastructure, do not meet the thresholds for "substantial improvement" under § 55.2(b)(12), and do not include the installation of equipment below the FFRMS floodplain elevation.

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

5-Step Process is applicable per 55.14.

Provide documentation of 5-Step Process.

Select the applicable citation:

- (a) HUD actions involving the disposition of HUD-acquired multifamily housing projects or “bulk sales” of HUD-acquired one- to four-family properties in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24).
- (b) HUD's actions under the National Housing Act (12 U.S.C. 1701) for the purchase or refinancing of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, and intermediate care facilities, in communities that are in good standing under the NFIP.
- (c) HUD's or the recipient's actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, intermediate care facilities, and one- to four-family properties, in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and are in good standing, provided that the number of units is not increased more than 20 percent, the action does not involve a conversion from nonresidential to residential land use, the action does not meet the thresholds for “substantial improvement” under § 55.2(b)(10), and the footprint of the structure and paved areas is not increased by more than 20 percent.
- (d) HUD's (or the recipient's) actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing nonresidential buildings and structures, in communities that are in the Regular Program of the NFIP and are in good standing, provided that the action does not meet the thresholds for “substantial improvement” under § 55.2(b)(10) and that the footprint of the structure and paved areas is not increased by more than 20 percent
- (e) HUD's or the recipient's actions under any HUD program involving the repair, rehabilitation, or replacement of existing nonstructural improvements including streets, curbs and gutters, where any increase of the total impervious surface area of the facility is de minimis. This provision does not include critical actions, levee systems, chemical storage facilities (including any tanks), wastewater facilities, or sewer lagoons.

Continue to Question 8. Mitigation.

- 8-Step Process applies.

Provide a completed 8-Step Process, including the early public notice and the final notice.

Continue to Question 8. Mitigation.

8. Mitigation

The project involves mitigation to potential flood damages at the existing Greenwood WWTP. The project is being done to allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. Under this project, measures are proposed to protect those structures that are most susceptible to flooding inside the plant along with interior drainage system improvements and grading improvements to collect stormwater from the critical areas within the plant that are prone to ponding in and around plant facilities. The major improvements include the following items:

- Site grading, piping and floodway improvements
- Flooding walls for identified plant structures
- A new effluent pump station (EPS) of firm capacity up to 36 MGD
- Miscellaneous improvements

The project is planned to begin in January 2027 and take approximately 12 months to complete.

For the project to comply with this section, all adverse impacts must be mitigated. Explain in detail the measures that must be implemented to mitigate the impact or effect, including the timeline for implementation. Note: newly constructed and substantially improved structures within the FFRMS floodplain must be elevated to the FFRMS floodplain elevation or floodproofed, if applicable.

Which of the following if any mitigation/minimization measures have been identified for this project in the 8-Step or 5-Step Process? Select all that apply.

- Buyout and demolition or other supported clearance of floodplain structures
- Insurance purchased in excess of statutory requirement under the Flood Disaster Protection Act of 1973
- Permeable surfaces
- Natural landscape enhancements that maintain or restore natural hydrology
- Planting or restoring native plant species
- Bioswales
- Stormwater capture and reuse
- Green or vegetative roofs with drainage provisions
- Natural Resources Conservation Service conservation easements or similar easements
- Floodproofing of structures as allowable (e.g. non-residential floors)
- Elevating structures (including freeboard above the required base flood elevations)
- Levee or structural protection from flooding
- Channelizing or redefining the floodway or floodplain through a Letter of Map Revision (LOMR)

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- FIRM panel numbers
- CISA data or maps
- Information on other data or tools used or accessed
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project involves installation of emergency generators and completion of flood mitigation improvements at the Greenwood WWTP in Corpus Christi, Nueces County, Texas. The emergency generators will be installed out of the floodway. Some flood mitigation improvements will occur in the floodway. Based on the project including a critical action and using the base flood elevation plus three feet as the FFRMS, the FFRMS will be 31 feet. This was determined by reviewing the Nueces County Flood Insurance Study (FIS), effective date October 13, 2022. The flood profile from the FIS for Oso Creek Tributary No. 10, which is immediately west of the WWTP is included Attachment I. The 8-Step Process applies to this project. Mitigation measures will include site grading, piping and floodway improvements; flooding walls for identified plant structures; a new effluent pump station (EPS) of firm capacity up to 36 MGD; and miscellaneous improvements. Documentation of the 8-Step Process is included in Attachment I.

Include all documentation supporting your findings in your submission to HUD

Are formal compliance steps or mitigation required?

Yes

No

Worksheet Summary for 2013 Version

Compliance Determination

Attach 'Floodplain Management Partner Worksheet' (OMB No. 2506-0177), FIRM map indicating project location, and summary of 8-step or 5-step decision making process if applicable.

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Include all documentation supporting your findings in your submission to HUD

Are formal compliance steps or mitigation required?

Yes

No

Historic Preservation Worksheet

Historic Preservation (CEST and EA)

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties"
References		
https://www.hudexchange.info/environmental-review/historic-preservation		

Threshold

Is Section 106 review required for your project?

- No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the [PA Database](#) to find applicable PAs.)

Either provide the PA itself or a link to it here. Mark the applicable exemptions or include the text here:

The activities that will occur for the project are included in a list of activities not requiring review by SHPO in a Programmatic Agreement between the Texas Historical Commission and the Texas General Land Office. The PA is provided as Attachment J.

→ Continue to the Worksheet Summary.

- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

Either provide the memo itself or a link to it here. Explain and justify the other determination here:

→ Continue to the Worksheet Summary.

Yes, because the project includes activities with potential to cause effects (direct or indirect). → *Continue to Step 1.*

The Section 106 Process

After determining the need to do a Section 106 review, initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation.

Note that consultation continues through all phases of the review.

Step 1: Initiate consultation

Step 2: Identify and evaluate historic properties

Step 3: Assess effects of the project on historic properties

Step 4: Resolve any adverse effects

Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to HUD's website for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the [When To Consult With Tribes checklist](#) within [Notice CPD-12-006: Process for Tribal Consultation](#) to determine if you should invite tribes to consult on a particular project. Use the [Tribal Directory Assessment Tool \(TDAT\)](#) to identify tribes that may have an interest in the area where the project is located. Note that consultants may not initiate consultation with Tribes.

Select all consulting parties below (check all that apply):

- State Historic Preservation Officer (SHPO)
- Advisory Council on Historic Preservation
- Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native
- Hawaiian Organizations (NHOs)

List all tribes that were consulted here and their status of consultation:

Apache Tribe of Oklahoma – Consultation letter sent on 2/12/2026
Comanche Nation, Oklahoma – Consultation letter sent on 2/12/2026
Tonkawa Tribe of Oklahoma – Consultation letter sent on 2/12/2026
Wichita and Affiliated Tribes – Consultation letter sent on 2/12/2026

Consultation letters are provided as Attachment K.

Other Consulting Parties

List all consulting parties that were consulted here and their status of consultation:

Describe the process of selecting consulting parties and initiating consultation here:

The HUD Tribal Directory Assessment Tool was used to identify tribes that may have an interest in Nueces County. The tool identified four tribes, the Apache Tribe of Oklahoma, the Comanche Nation, Oklahoma, the Tonkawa Tribe of Oklahoma, and the Wichita and Affiliated Tribes. Consultation letters were sent to the four tribes on 2/12/2026.

Provide all correspondence, notices, and notes (including comments and objections received) and continue to Step 2.

Step 2 - Identify and Evaluate Historic Properties

Define the Area of Potential Effect (APE), either by entering the address(es) or providing a map depicting the APE. Attach an additional page if necessary.

A site map showing the project area, which includes the APE, is provided in the consultation letters in Attachment K.

Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register.

Refer to HUD's website for guidance on identifying and evaluating historic properties.

In the space below, list historic properties identified and evaluated in the APE.

Every historic property that may be affected by the project should be listed. For each historic property or district, include the National Register status, whether the SHPO has concurred with the finding, and whether information on the site is sensitive. Attach an additional page if necessary.

No historic properties are identified on or near the project area. A map from the Texas Historical Commission is included as Attachment L.

Provide the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination.

Was a survey of historic buildings and/or archeological sites done as part of the project?

If the APE contains previously unsurveyed buildings or structures over 50 years old, or there is a likely presence of previously unsurveyed archeological sites, a survey may be necessary. For Archeological surveys, refer to HP Fact Sheet #6, [Guidance on Archeological Investigations in HUD Projects](#).

- Yes → *Provide survey(s) and report(s) and continue to Step 3.*

Additional notes:

- No → *Continue to Step 3.*

Step 3 - Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. ([36 CFR 800.5](#)) Consider direct and indirect effects as applicable as per HUD guidance.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

- No Historic Properties Affected

Document reason for finding:

- No historic properties present. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

- Historic properties present, but project will have no effect upon them. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to ([36 CFR 800.4\(d\)\(1\)](#)) and consult further to try to resolve objection(s).

No Adverse Effect

Document reason for finding:

Does the No Adverse Effect finding contain conditions?

Yes

Check all that apply: (check all that apply)

- Avoidance
- Modification of project
- Other

Describe conditions here:

→ Monitor satisfactory implementation of conditions. Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.

No → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to ([36 CFR 800.5\(c\)\(2\)](#)) and consult further to try to resolve objection(s).

Adverse Effect

Document reason for finding:

Copy and paste applicable Criteria into text box with summary and justification.

Criteria of Adverse Effect: [36 CFR 800.5](#)]

Notify the Advisory Council on Historic Preservation of the Adverse Effect and provide the documentation outlined in [36 CFR 800.11\(e\)](#). The Council has 15 days to decide whether to enter the consultation (Not required for projects covered by a Programmatic Agreement).

→ *Continue to Step 4.*

Step 4 - Resolve Adverse Effects

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to HUD guidance and [36 CFR 800.6 and 800.7](#).

Were the Adverse Effects resolved?

Yes

Describe the resolution of Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation:

For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Provide signed Memorandum of Agreement (MOA) or Standard Mitigation Measures Agreement (SMMA). Continue to the Worksheet Summary.*

No

The project must be cancelled unless the “Head of Agency” approves it. Either provide approval from the “Head of Agency” or cancel the project at this location.

Describe the failure to resolve Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation and “Head of the Agency”:

Explain in detail the exact conditions or measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Provide correspondence, comments, documentation of decision, and “Head of Agency” approval. Continue to the Worksheet Summary.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The activities that will occur for the project are included in a list of activities not requiring review by SHPO in a Programmatic Agreement (PA) between the Texas Historical Commission and the Texas General Land Office. The PA is provided as Attachment J.

The Apache Tribe of Oklahoma, the Comanche Nation, Oklahoma, the Tonkawa Tribe of Oklahoma, and the Wichita and Affiliated Tribes were sent consultation letters on 2/12/2026. Tribal consultation correspondence is provided as Attachment K.

The Texas Historical Commission (THC) Atlas identified no historic sites on or near the project area. A THC map is provided as Attachment L.

Are formal compliance steps or mitigation required?

Yes

No

Noise Abatement and Control Worksheet

Noise (EA Level Reviews)

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B
References		
https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control		

1. What activities does your project involve? Check all that apply:

- New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

→ *Continue to Question 2.*

- Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ *Continue to Question 2.*

- A research demonstration project which does not result in new construction or reconstruction, interstate, land sales registration, or any timely emergency assistance under disaster assistance provisions or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

- None of the above

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.*

Noise generators were found within the threshold distances.

→ *Continue to Question 3.*

3. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:

Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.*

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a))

Indicate noise level here:

If project is rehabilitation:

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.*

If project is new construction:

Is the project in a largely undeveloped area¹?

No

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.*

¹ A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses or does not have water and sewer capacity to serve the project.

Yes

→ Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). Elevate this review to an EIS-level review.

Unacceptable: (Above 75 decibels)

Indicate noise level here:

If project is rehabilitation:

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels. Consider converting this property to a non-residential use compatible with high noise levels.

→ Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.

If project is new construction:

Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). You may either complete an EIS or provide a waiver signed by the appropriate authority. Indicate your choice:

Convert to an EIS

→ Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 4.

Provide waiver

→ Provide an Environmental Impact Statement waiver from the Certifying Officer or the Assistant Secretary for Community Planning and Development per 24 CFR 51.104(b)(2) and noise analysis, including noise level and data used to complete the analysis.

Continue to Question 4.

- 4. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

Mitigation as follows will be implemented:

→ Provide drawings, specifications, and other materials as needed to describe the project's noise mitigation measures. Continue to the Worksheet Summary.

No mitigation is necessary.

Explain why mitigation will not be made here:

→ Continue to the Worksheet Summary.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project does not involve new construction for residential use, rehabilitation of an existing residential property, or a research demonstration project and is therefore in compliance with the noise regulations of 24 CFR Part 51, Subpart B.

Are formal compliance steps or mitigation required?

Yes

No

Sole Source Aquifer Worksheet

Sole Source Aquifers (CEST and EA)

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149
Reference		
https://www.hudexchange.info/environmental-review/sole-source-aquifers		

1. Does your project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

- Yes → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*
- No → *Continue to Question 2.*

2. Is the project located on a sole source aquifer (SSA)¹?

- No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area.*
- Yes → *Continue to Question 3.*

3. Does your region have a memorandum of understanding (MOU) or other working agreement with EPA for HUD projects impacting a sole source aquifer?

Contact your Field or Regional Environmental Officer or visit the HUD webpage at the link above to determine if an MOU or agreement exists in your area.

- Yes → *Provide the MOU or agreement as part of your supporting documentation. Continue to Question 4.*
- No → *Continue to Question 5.*

4. Does your MOU or working agreement exclude your project from further review?

- Yes → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination and document where your project fits within the MOU or agreement.*

¹ A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

No → *Continue to Question 5.*

5. Will the proposed project contaminate the aquifer and create a significant hazard to public health?

Consult with your Regional EPA Office. Your consultation request should include detailed information about your proposed project and its relationship to the aquifer and associated streamflow source area. EPA will also want to know about water, storm water and waste water at the proposed project. Follow your MOU or working agreement or contact your Regional EPA office for specific information you may need to provide. EPA may request additional information if impacts to the aquifer are questionable after this information is submitted for review.

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide your correspondence with the EPA and all documents used to make your determination.*

Yes → *Work with EPA to develop mitigation measures. If mitigation measures are approved, attach correspondence with EPA and include the mitigation measures in your environmental review documents and project contracts. If EPA determines that the project continues to pose a significant risk to the aquifer, federal financial assistance must be denied. Continue to Question 6.*

6. In order to continue with the project, any threat must be mitigated, and all mitigation must be approved by the EPA. Explain in detail the proposed measures that can be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project area is not located on a sole source aquifer. A map showing the nearest sole source aquifer and the project area is provided as Attachment M.

Are formal compliance steps or mitigation required?

Yes

No

Wetlands Protection Worksheet

Wetlands (CEST and EA)

General requirements	Legislation	Regulation
Executive Order 11990 discourages that direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.
References		
https://www.hudexchange.info/environmental-review/wetlands-protection		

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance?

The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order.

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes → *Continue to Question 2.*

2. Will the new construction or other ground disturbance impact an on- or off-site wetland?

The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands.

No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.
→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

→ You must determine that there are no practicable alternatives to wetlands development by completing the 8-Step Process.

Provide a completed 8-Step Process as well as all documents used to make your determination, including a map. Be sure to include the early public notice and the final notice with your documentation.

Continue to Question 3.

- 3. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

Which of the following mitigation actions have been or will be taken? Select all that apply:

- Permeable surfaces
- Natural landscape enhancements that maintain or restore natural hydrology through infiltration
- Native plant species
- Bioswales
- Evapotranspiration
- Stormwater capture and reuse
- Green or vegetative roofs with drainage provisions
- Natural Resources Conservation Service conservation easements
- Compensatory mitigation

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project will not impact a wetland in terms Executive Order 11990. A National Wetlands Inventory Map of the project area is included as Attachment N.

Are formal compliance steps or mitigation required?

Yes

No

Wild and Scenic Rivers Worksheet

Wild and Scenic Rivers (CEST and EA)

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297
References		
https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers		

1. Is your project within proximity of a NWSRS river as defined below?

Wild & Scenic Rivers: These rivers or river segments have been designated by Congress or by states (with the concurrence of the Secretary of the Interior) as wild, scenic, or recreational

Study Rivers: These rivers or river segments are being studied as a potential component of the Wild & Scenic River system.

Nationwide Rivers Inventory (NRI): The National Park Service has compiled and maintains the NRI, a register of river segments that potentially qualify as national wild, scenic, or recreational river areas

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map identifying the project site and its surrounding area or a list of rivers in your region in the Screen Summary at the conclusion of this screen.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

→ Continue to Question 2.

2. Could the project do *any* of the following?

- Have a direct and adverse effect within Wild and Scenic River Boundaries,
- Invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, or
- Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment.

Consultation with the appropriate federal/state/local/tribal Managing Agency(s) is required, pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect on a Wild & Scenic River or a Study River and, if so, to determine the appropriate avoidance or mitigation measures.

Note: Concurrence may be assumed if the Managing Agency does not respond within 30 days; however, you are still obligated to avoid or mitigate adverse effects on the rivers identified in the NWSRS

No, the Managing Agency has concurred that the proposed project will not alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Yes, the Managing Agency was consulted and the proposed project may alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Continue to Question 3.*

3. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project area is not within proximity of a NWSRS river. A map showing the nearest NWSRS river is included as Attachment O.

Are formal compliance steps or mitigation required?

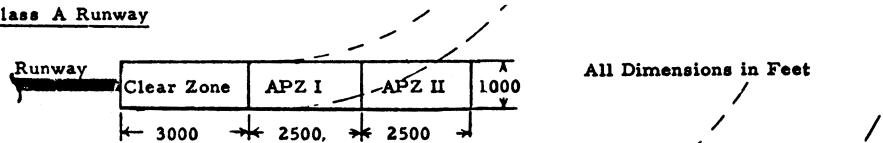
Yes

No

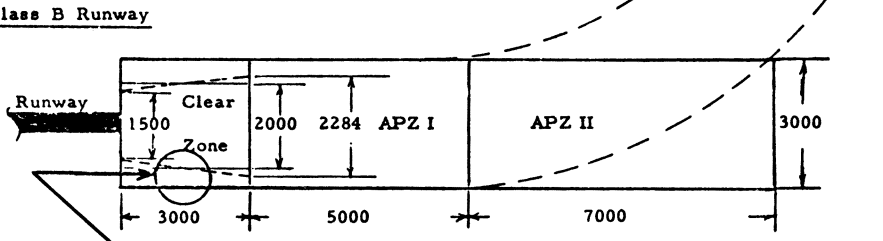
**Attachment A –
DOD Guidelines and Accident Potential Zone Map**

§ 256.7 Accident potential zone guidelines.

Class A Runway



Class B Runway



Width of clear zone may be based on individual service analysis of highest accident potential area for specific runway use and varied based on acquisition constraints. 3000 foot wide clear zone is desirable for new construction.

§ 256.8 Land use compatibility guidelines for accident potential.

ZONES AND FOOTNOTES—LAND USE CATEGORY—Continued
[See footnotes at end of table]

ZONES AND FOOTNOTES—LAND USE CATEGORY
[See footnotes at end of table]

	Compatibility ¹		
	Clear zone	APZ I	APZ II
Residential:			
Single family	No	No	Yes. ²
2 to 4 familydodo	No.
Multifamily dwellingsdodo	Do.
Group quartersdodo	Do.
Residential hotelsdodo	Do.
Mobile home parks or courtsdodo	Do.
Other residentialdodo	Do.
Industrial manufacturing: ³			
Food and kindred productsdodo	Yes.
Textile mill productsdodo	Do.
Appareldodo	No.
Lumber and wood productsdo	Yes	Do.
Furniture and fixturesdodo	Do.
Paper and allied productsdodo	Do.
Printing, publishingdodo	Do.
Chemicals and allied productsdo	No	No.
Petroleum refining and related industries.dodo	Do.

	Compatibility ¹		
	Clear zone	APZ I	APZ II
Rubber and miscellaneous plastic goods.dodo	Do.
Stone, clay, and glass productsdo	Yes	Yes.
Primary metal industriesdodo	Do.
Fabricated metal productsdodo	Do.
Professional, scientific and controlling instruments.do	No	No.
Miscellaneous manufacturingdo	Yes	Yes.
Transportation, communications and utilities: ⁴			
Railroad, rapid rail transit (ongrade).	Yes	Yes ⁴ ..	Yes.
Highway and street ROWdo	Yes	Do.
Auto parking	Nodo	Do.
Communication	Yesdo	Do.
Utilitiesdo	Yes ⁴ ..	Do.
Other transportation, communications and utilities.do	Yes	Do.
Commercial/retail trade:			
Wholesale trade	Nodo	Do.
Building materials—retaildodo	Do.
General merchandise—retaildo	No	Do.

§ 256.9

32 CFR Ch. I (7-1-11 Edition)

ZONES AND FOOTNOTES—LAND USE
CATEGORY—Continued
[See footnotes at end of table]

ZONES AND FOOTNOTES—LAND USE
CATEGORY—Continued
[See footnotes at end of table]

	Compatibility ¹		
	Clear zone	APZ I	APZ II
Food—retaildodo	Do.
Automotive, marine, aviation—retaildo	Yes	Do.
Apparel and accessories—retaildo	No	Do.
Furniture, homefurnishing—retaildodo	Do.
Eating and drinking placesdodo	No.
Other retail tradedodo	Yes.
Personal and business services: ⁵			
Finance, insurance and real estatedodo	Do.
Personal servicesdodo	Do.
Business servicesdodo	Do.
Repair servicesdo	Yes	Do.
Professional servicesdo	No	Do.
Contract construction servicesdo	Yes	Do.
Indoor recreation servicesdo	No	Do.
Other servicesdodo	Do.
Public and quasi-public services:			
Government servicedodo	Yes. ⁵
Educational services	No	No	No.
Cultural activitiesdodo	Do.
Medical and other health servicesdodo	Do.
Cemeteriesdo	Yes ⁶ ..	Yes. ⁶
Nonprofit organization including churchesdo	No	No.
Other public and quasi-public servicesdodo	Yes.
Outdoor recreation:			
Playground's neighboring parksdodo	Yes.
Community and regional parksdo	Yes ⁷ ..	Yes. ⁷
Nature exhibitsdo	Yes	Yes.
Spectator sports including arenasdo	No	No.
Golf course, ⁸ riding stables ⁹do	Yes	Yes.
Water based recreational areasdodo	Do.
Resort and group campsdo	No	No.
Entertainment assemblydodo	Do.
Other outdoor recreationdo	Yes ⁷ ..	Yes.
Resource production and extraction and open land:			
Agriculture ¹⁰	Yes	Yes	Do.
Livestock farming, animal breeding ¹¹	Nodo	Do.
Forestry activities ¹²	No ¹³ ..	Yes	Do.
Fishing activities and related services ¹⁴	No ¹⁵ ..	Yes ¹⁴	Do.
Mining activities	No	Yes	Do.
Permanent open space	Yesdo	Do.

	Compatibility ¹		
	Clear zone	APZ I	APZ II
Water areas ¹⁴dodo	Do.

Footnotes.

¹A "Yes" or "No" designation for compatible land use is to be used only for gross comparison. Within each, uses exist where further definition may be needed as to whether it is clear or normally acceptable/unacceptable owing to variations in densities of people and structures.

²Suggested maximum density 1-2 DU/AC, possibly increased under a planned unit development where maximum lot covered less than 20 percent.

³Tactics to be considered: Labor intensity, structural coverage, explosive characteristics, air pollution.

⁴No passenger terminals and no major above ground transmission lines in APZ I.

⁵Low intensity office uses only. Meeting places, auditoriums, etc., not recommended.

⁶Excludes chapels.

⁷Facilities must be low intensity.

⁸Clubhouse not recommended.

⁹Concentrated rings with large classes not recommended.

¹⁰Includes livestock grazing but excludes feedlots and intensive animal husbandry.

¹¹Includes feedlots and intensive animal husbandry.

¹²No structures (except airfield lighting), buildings or above ground utility/communication lines should be located in the clear zone. For further runway safety clearance limitations pertaining to the clear zone see AFM 86-6 TM 5-803-4 and NAVFAC P-80.²

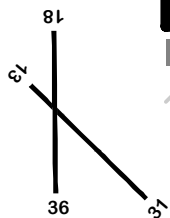
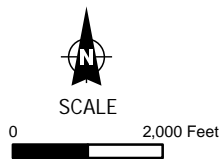
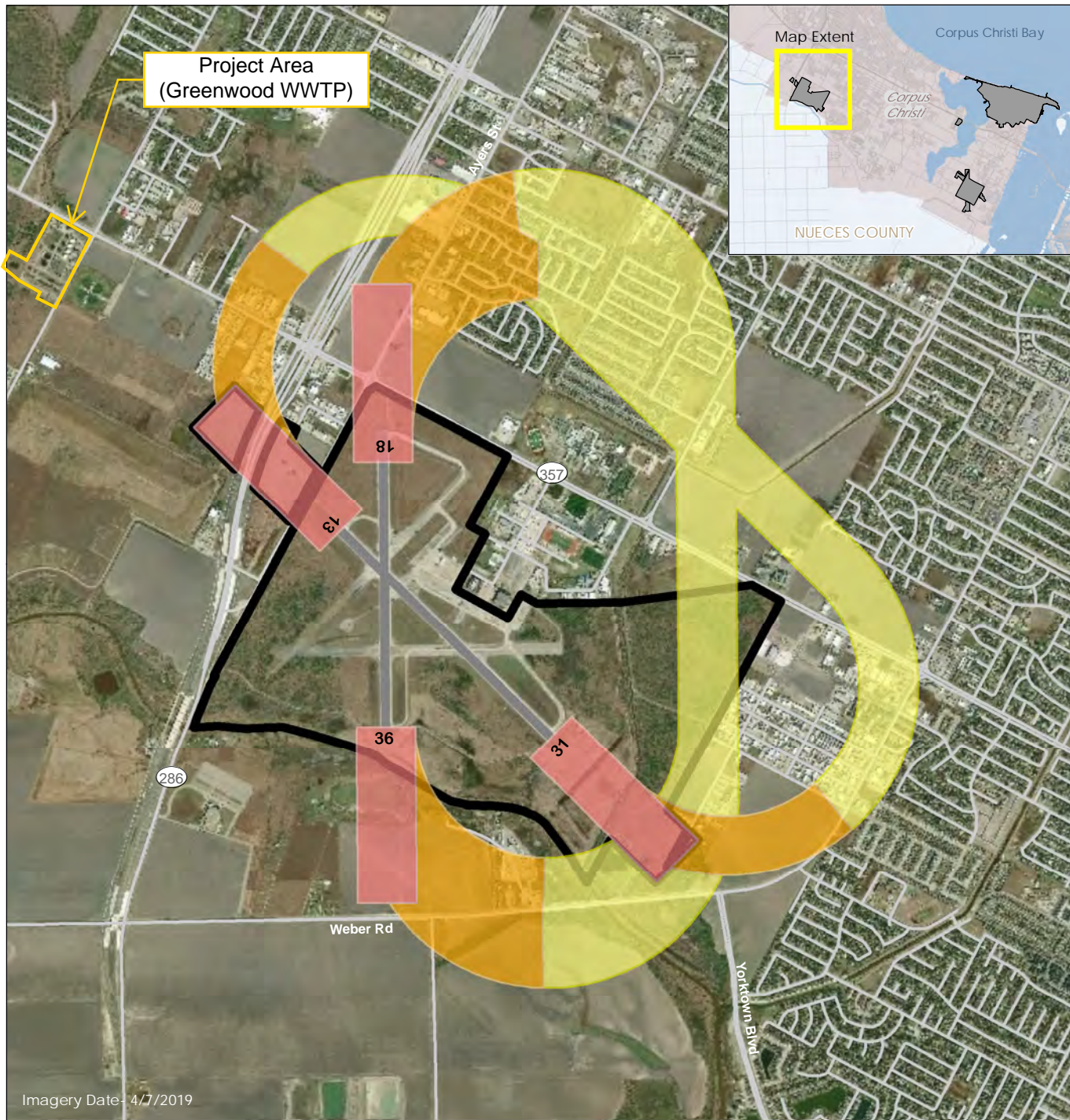
¹³Lumber and timber products removed due to establishment, expansion or maintenance of clear zones will be disposed of in accordance with DoD Instruction 4170.7, "Natural Resources—Forest Management," June 21, 1965 (32 CFR 233) and DoD Instruction 7310.1, "Accounting and Reporting for Property Disposal and Proceeds from Sale of Disposable Personal Property and Lumber or Timber Products," July 10, 1970.¹

¹⁴Includes hunting and fishing.

¹⁵Controlled hunting and fishing may be permitted for the purpose of wildlife control.

§ 256.9 Real estate interests to be considered for clear zones and accident potential zone.

- (a) The right to make low and frequent flights over said land and to generate noises associated with:
 - (1) Aircraft in flight, whether or not while directly over said land,
 - (2) Aircraft and aircraft engines operating on the ground at said base, and,
 - (3) Aircraft engine test/stand/cell operations at said base.
- (b) The right to regulate or prohibit the release into the air of any substance which would impair the visibility or otherwise interfere with the operations of aircraft, such as, but not limited to, steam, dust and smoke.
- (c) The right to regulate or prohibit light emissions, either direct or indirect (reflective), which might interfere with pilot vision.
- (d) The right to prohibit electrical emissions which would interfere with



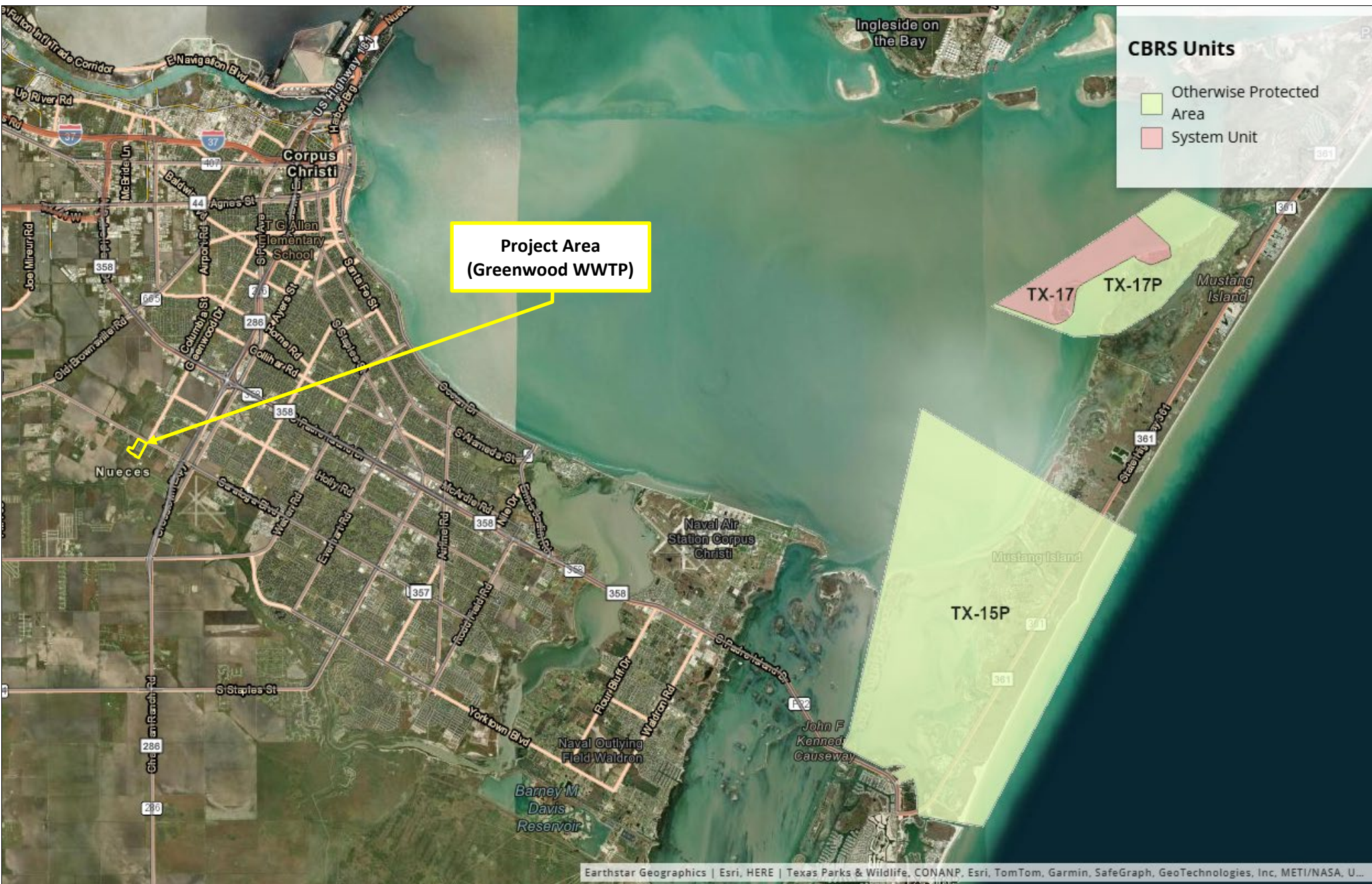
- Legend**
- NOLF Cabaniss
 - Runway
 - Road
 - 2020 AICUZ APZs Clear Zone
 - APZ I
 - APZ II

Figure 4-2
2020 AICUZ Clear Zones
and Accident Potential Zones,
NOLF Cabaniss

Naval Air Station
Corpus Christi, Texas

Source: ESRI 2018; Navy, 2020, BRR 2020
Ecology and Environment, Inc. 2020

**Attachment B –
USFWS Coastal Barrier Resources System Map**



Earthstar Geographics | Esri, HERE | Texas Parks & Wildlife, CONANP, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, U...

Note: Property Boundaries Shown are Approximate.



Drawn By:	TLD	Scale:	As Shown
Project Number:	24L0174A_07	Date:	11/3/25

Coastal Barrier Resources System Map
 Greenwood Wastewater Treatment Plant
 6541 Greenwood Drive, Corpus Christi, Nueces County, Texas

**Attachment C –
FEMA Flood Insurance Rate Map and Insurance
Certificate for Greenwood WWTP**

NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size. The community map repository should be consulted for possible updated or additional flood hazard information.

To obtain more detailed information in areas where **Base Flood Elevations (BFEs)** and/or **floodways** have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stillwater Elevations tables contained within the Flood Insurance Study (FIS) report that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation information. Accordingly, flood elevation data presented in the FIS report should be utilized in conjunction with the FIRM for purposes of construction and/or floodplain management.

Coastal Base Flood Elevations shown on this map apply only landward of 0.0' North American Vertical Datum of 1988 (NAVD 88). Users of this FIRM should be aware that coastal flood elevations are also provided in the Summary of Stillwater Elevations table in the Flood Insurance Study Report for this jurisdiction. Elevations shown in the Summary of Stillwater Elevations table should be used for construction, and/or floodplain management purposes when they are higher than the elevations shown on this FIRM.

Boundaries of the **floodways** were computed at cross sections and interpolated between cross sections. The floodways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Floodway widths and other pertinent floodway data are provided in the Flood Insurance Study report for this jurisdiction.

Certain areas not in Special Flood Hazard Areas may be protected by **flood control structures**. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study report for information on flood control structures in this jurisdiction.

The **projection** used in the preparation of this map was Texas State Plane, South Zone (FIPS 4205). The **horizontal datum** was NAD83, GRS80 spheroid. Differences in datum, spheroid, projection or State Plane zones used in the production of FIRMs for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of this FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same **vertical datum**. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at <http://www.ngs.noaa.gov> or contact the National Geodetic Survey at the following address:

NGS Information Services
NOAA, NINGS12
National Geodetic Survey, SSMC-3, #9202
1315 East-West Highway
Silver Spring, Maryland 20910-3282
(301) 713-3242

To obtain current elevation, description, and/or location information for **bench marks** shown on this map, please contact the Information Services Branch of the National Geodetic Survey at (301) 713-3242, or visit their website at <http://www.ngs.noaa.gov/>.

Base map information shown on this FIRM was derived from multiple sources. This information was compiled from the National Geodetic Survey, 2004, U.S. Census Bureau, 2010, U.S. Geological Survey, 1989 and 2004, National Agriculture Imagery Program (NAIP), 2014, Texas Natural Resources Information System (TNRIS), 1995 and 2010.

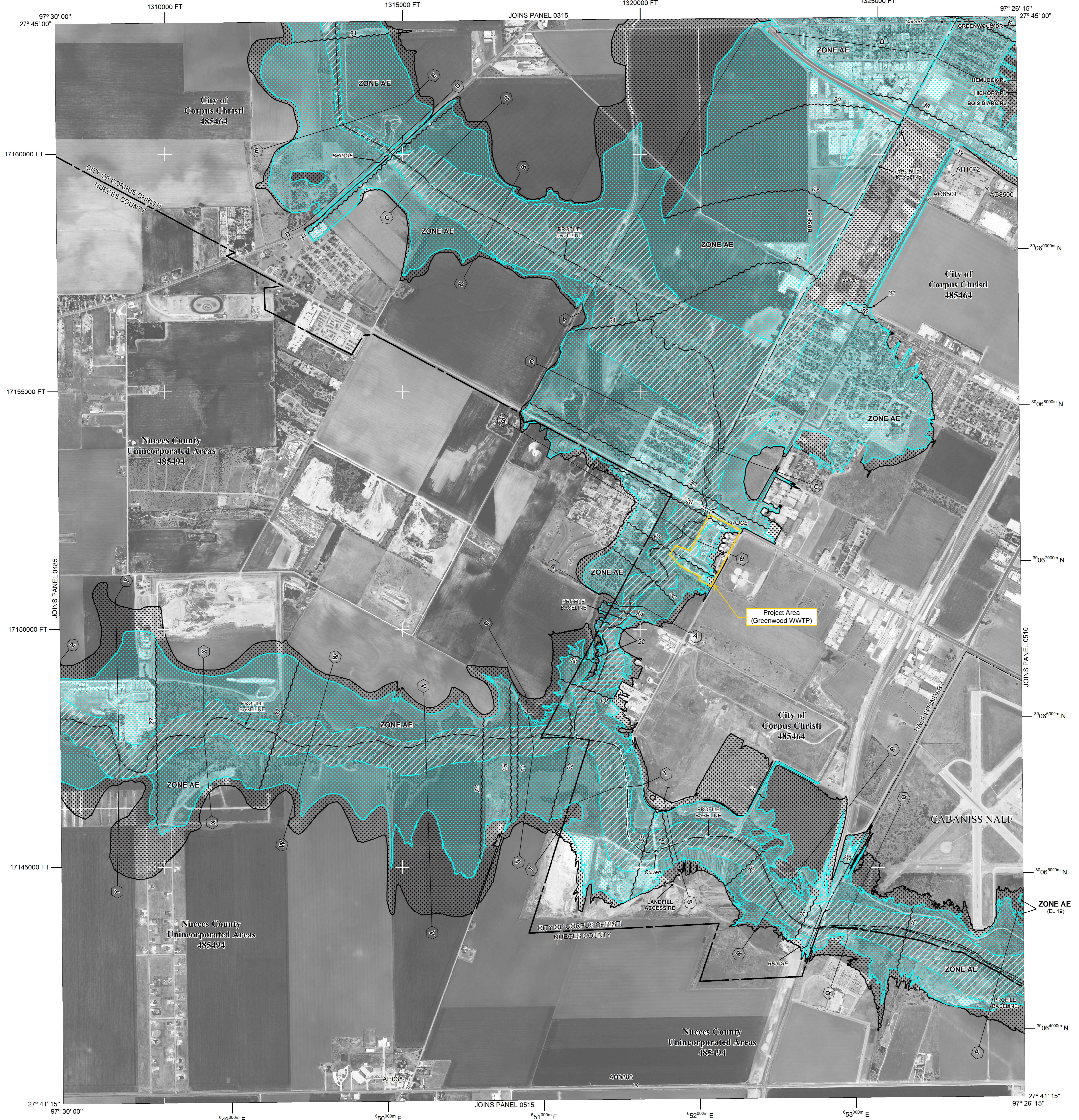
This map reflects more detailed and up-to-date **stream channel configurations** than those shown on the previous FIRM for this jurisdiction. The floodplains and floodways that were transferred from the previous FIRM may have been adjusted to conform to these new stream channel configurations. As a result, the Flood Profiles and Floodway Data tables in the Flood Insurance Study report (which contains authoritative hydraulic data) may reflect stream channel distances that differ from what is shown on this map.

Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations.

Please refer to the separately printed **Map Index** for an overview map of the county showing the layout of map panels; community map repository addresses; and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which each community is located.

For information on available products associated with this FIRM visit the **FEMA Map Service Center (MSC)** website at <http://msc.fema.gov>. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the MSC website.

If you have **questions about this map**, how to order products or the National Flood Insurance Program in general, please call the **FEMA Map Information eXchange (FMIX)** at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA website at <http://www.fema.gov/national-flood-insurance-program>



LEGEND

- SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD
- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
- ZONE AR** Special Flood Hazard Area formerly protected from the 1% annual chance flood by a flood control system that was subsequently decertified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
- ZONE A99** Area to be protected from 1% annual chance flood by a Federal flood protection system under construction; no Base Flood Elevations determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.
- FLOODWAY AREAS IN ZONE AE
- The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.
- OTHER FLOOD AREAS
- ZONE X** Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.
- OTHER AREAS
- ZONE X** Areas determined to be outside the 0.2% annual chance floodplain.
- ZONE D** Areas in which flood hazards are undetermined, but possible.
- 1% annual chance floodplain boundary
- 0.2% annual chance floodplain boundary
- Floodway boundary
- Zone D Boundary
- Limit of Moderate Wave Action
- Boundary dividing Special Flood Hazard Areas Zones and boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths or flood velocities.
- Base Flood Elevation line and value; elevation in feet*
- Base Flood Elevation value where uniform within zone; elevation in feet*
- *Referenced to the North American Vertical Datum of 1988
- Cross section line
- Transsect line
- 97° 07' 30", 32° 22' 30" Geographic coordinates referenced to the North American Datum of 1983 (NAD 83), Western Hemisphere
- 76° 00' E 1000-meter Universal Transverse Mercator grid values, zone 14
- 600000 FT 5000-foot grid ticks; Texas State Plane coordinate system, South zone (FIPZONE 4205), Transverse Mercator
- DX5510 X Bench mark (see explanation in Notes to Users section of this FIRM panel)
- M1.5 River Mile

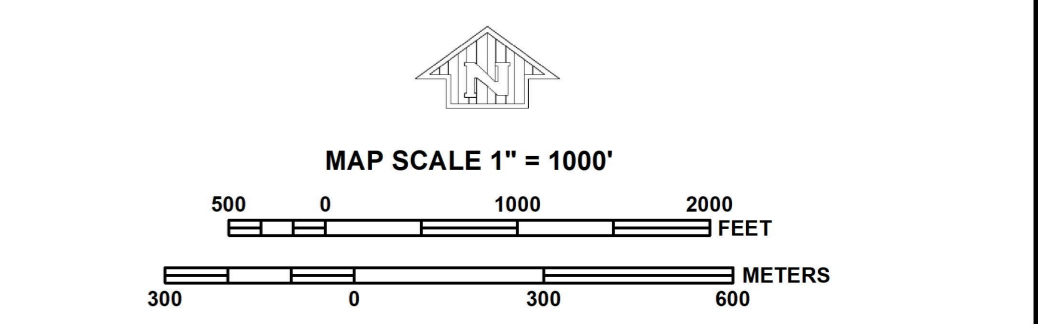
MAP REPOSITORIES
Refer to Map Repositories list on Map Index.

EFFECTIVE DATE OF COUNTYWIDE FLOOD INSURANCE RATE MAP PANEL
October 13, 2022

EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL

For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.

To determine if flood insurance is available in this community, contact your insurance agent or call the National Flood Insurance Program at 1-800-638-6620.



NATIONAL FLOOD INSURANCE PROGRAM

PANEL 0505G

FIRM

FLOOD INSURANCE RATE MAP

NUECES COUNTY, TEXAS AND INCORPORATED AREAS

PANEL 505 OF 775

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
CORPUS CHRISTI, CITY OF	485464	0505	G
NUECES COUNTY	485494	0505	G

Notice to User: The **Map Number** shown below should be used when placing map orders; the **Community Number** shown above should be used on insurance applications for the subject community.

MAP NUMBER
48355C0505G

EFFECTIVE DATE
OCTOBER 13, 2022

Federal Emergency Management Agency



EVIDENCE OF PROPERTY INSURANCE

DATE (MM/DD/YYYY)

2/13/2026

THIS EVIDENCE OF PROPERTY INSURANCE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE ADDITIONAL INTEREST NAMED BELOW. THIS EVIDENCE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS EVIDENCE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE ADDITIONAL INTEREST.

AGENCY Acisure South Insurance Services, LLC 1317 Citizens Blvd Leesburg, FL 34748		PHONE (A/C, No, Ext): 800-845-8437	COMPANY Lloyd's Syndicate 2987 - Brit Syndicate 2987 c/o Brit Syndicates Limited The Leadenhall Building 122 Leadenhall Street London, EC3V 4SAB	
FAX (A/C, No):		E-MAIL ADDRESS:		License#: L122365
CODE:		SUB CODE:		
AGENCY CUSTOMER ID #: CORPCHR-06		LOAN NUMBER		POLICY NUMBER B1820WLS25C704
INSURED City of Corpus Christi P O Box 9277 ATTN : Risk Management Corpus Christi TX 78469-9277		EFFECTIVE DATE 05/04/2025	EXPIRATION DATE 05/04/2026	<input type="checkbox"/> CONTINUED UNTIL TERMINATED IF CHECKED
THIS REPLACES PRIOR EVIDENCE DATED:				

PROPERTY INFORMATION

LOCATION/DESCRIPTION
 Greenwood WWTP - 6541 Greenwood Dr., Corpus Christi, TX 78415
 Flood Zone B

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS EVIDENCE OF PROPERTY INSURANCE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

COVERAGE INFORMATION

PERILS INSURED BASIC BROAD X SPECIAL

COVERAGE / PERILS / FORMS	AMOUNT OF INSURANCE	DEDUCTIBLE
All Risk Perils - Including Wind & Flood	4,262,500	500,000

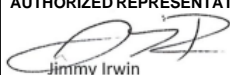
REMARKS (Including Special Conditions)

ALL OTHER PERILS (AOP) \$500,000 Per Occurrence; except
 WINDSTORM OR HAIL (W/H) \$500,000 Per Occurrence
 NAMED STORM (NS) & WIND DRIVEN PRECIPITATION (WDP) 3% of Total Insured Values, per building, subject to \$500K min.
 FLOOD (includes Storm Surge) \$500,000 Per Occ
 EARTH MOVEMENT (EM) \$500,000 Per Occurrence

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

ADDITIONAL INTEREST

NAME AND ADDRESS Texas General Land Office INSURANCE VERIFICATION PURPOSES	<input type="checkbox"/> ADDITIONAL INSURED	<input type="checkbox"/> LENDER'S LOSS PAYABLE	<input type="checkbox"/> LOSS PAYEE
	<input type="checkbox"/> MORTGAGEE	LOAN #	
AUTHORIZED REPRESENTATIVE  Jimmy Irwin			

**Attachment D –
Current List of Non-Attainment Areas**



You are here: EPA Home > Green Book > Current Nonattainment Counties for All Criteria Pollutants

Current Nonattainment Counties for All Criteria Pollutants

Data is current as of October 31, 2025

The 8-hour Ozone (1997) standard was revoked on April 6, 2015 and the 1-hour Ozone (1979) standard was revoked on June 15, 2005.

The asterisk (*) indicates only a portion of the county is included in the designated nonattainment area (NA).

Download National Dataset of all designated areas (currently nonattainment, maintenance, revoked):
[dbf](#) | [xls](#) | [Data dictionary \(PDF\)](#)

Listed by State, County, NAAQS * Part County NA NA Area Name (Classification, if applicable)

ALASKA

Fairbanks North Star Borough
PM-2.5 (2006) *Fairbanks, AK - (Serious)

ARIZONA

Cochise County
PM-10 (1987) *Cochise County; Paul Spur/Douglas planning area, AZ - (Moderate)

Gila County
Lead (2008) *Hayden, AZ
PM-10 (1987) *Hayden, AZ - (Moderate)
PM-10 (1987) *Miami, AZ - (Moderate)
Sulfur Dioxide (2010) *Hayden, AZ
Sulfur Dioxide (2010) *Miami, AZ
8-Hour Ozone (2015) *Phoenix-Mesa, AZ - (Moderate)

Maricopa County
PM-10 (1987) *Maricopa and Pinal Counties; Phoenix planning area, AZ - (Serious)
8-Hour Ozone (2008) *Phoenix-Mesa, AZ - (Moderate)
8-Hour Ozone (2015) *Phoenix-Mesa, AZ - (Moderate)

Pima County
PM-10 (1987) *Pima County; Rillito planning area, AZ - (Moderate)

Pinal County
Lead (2008) *Hayden, AZ
PM-10 (1987) *Hayden, AZ - (Moderate)
PM-10 (1987) *Maricopa and Pinal Counties; Phoenix planning area, AZ - (Serious)
PM-10 (1987) *Miami, AZ - (Moderate)
PM-10 (1987) *Pinal County (part); West Pinal, AZ - (Serious)
PM-2.5 (2006) *West Central Pinal, AZ - (Moderate)
Sulfur Dioxide (1971) *Hayden (Pinal County), AZ
Sulfur Dioxide (2010) *Hayden, AZ
8-Hour Ozone (2008) *Phoenix-Mesa, AZ - (Moderate)
8-Hour Ozone (2015) *Phoenix-Mesa, AZ - (Moderate)

Santa Cruz County
PM-10 (1987) *Santa Cruz County; Nogales planning area, AZ - (Moderate)

Yuma County
PM-10 (1987) *Yuma, AZ - (Moderate)
8-Hour Ozone (2015) *Yuma, AZ - (Marginal)

CALIFORNIA

Alameda County	
<i>PM-2.5 (2006)</i>	San Francisco Bay Area, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	San Francisco Bay Area, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	San Francisco Bay Area, CA - (Marginal)
Amador County	
<i>8-Hour Ozone (2015)</i>	Amador County, CA - (Marginal)
Butte County	
<i>8-Hour Ozone (2008)</i>	Chico (Butte County), CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	Butte County, CA - (Marginal)
Calaveras County	
<i>8-Hour Ozone (2008)</i>	Calaveras County, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	Calaveras County, CA - (Marginal)
Contra Costa County	
<i>PM-2.5 (2006)</i>	San Francisco Bay Area, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	San Francisco Bay Area, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	San Francisco Bay Area, CA - (Marginal)
El Dorado County	
<i>PM-2.5 (2006)</i>	*Sacramento, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	*Sacramento Metro, CA - (Severe 15)
<i>8-Hour Ozone (2015)</i>	*Sacramento Metro, CA - (Serious)
Fresno County	
<i>PM-2.5 (1997)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2006)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2012)</i>	San Joaquin Valley, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	San Joaquin Valley, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	San Joaquin Valley, CA - (Extreme)
Imperial County	
<i>PM-2.5 (2006)</i>	*Imperial County, CA - (Moderate)
<i>PM-2.5 (2012)</i>	*Imperial County, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	Imperial County, CA - (Moderate)
<i>8-Hour Ozone (2015)</i>	Imperial County, CA - (Marginal)
Inyo County	
<i>PM-10 (1987)</i>	*Inyo County; Owens Valley planning area, CA - (Serious)
Kern County	
<i>PM-10 (1987)</i>	*East Kern County, CA - (Serious)
<i>PM-2.5 (1997)</i>	*San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2006)</i>	*San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2012)</i>	*San Joaquin Valley, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	*Kern County (Eastern Kern), CA - (Severe 15)
<i>8-Hour Ozone (2008)</i>	*San Joaquin Valley, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	*Kern County (Eastern Kern), CA - (Serious)
<i>8-Hour Ozone (2015)</i>	*San Joaquin Valley, CA - (Extreme)
Kings County	
<i>PM-2.5 (1997)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2006)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2012)</i>	San Joaquin Valley, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	San Joaquin Valley, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	San Joaquin Valley, CA - (Extreme)
Los Angeles County	
<i>Lead (2008)</i>	*Los Angeles County-South Coast Air Basin, CA
<i>PM-2.5 (1997)</i>	*Los Angeles-South Coast Air Basin, CA - (Moderate)
<i>PM-2.5 (2006)</i>	*Los Angeles-South Coast Air Basin, CA - (Serious)
<i>PM-2.5 (2012)</i>	*Los Angeles-South Coast Air Basin, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	*Los Angeles-San Bernardino Counties (West Mojave Desert), CA - (Severe 15)
<i>8-Hour Ozone (2008)</i>	*Los Angeles-South Coast Air Basin, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	*Los Angeles-San Bernardino Counties (West Mojave Desert), CA - (Severe 15)
<i>8-Hour Ozone (2015)</i>	*Los Angeles-South Coast Air Basin, CA - (Extreme)
Madera County	
<i>PM-2.5 (1997)</i>	San Joaquin Valley, CA - (Serious)

<i>PM-2.5 (2006)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2012)</i>	San Joaquin Valley, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	San Joaquin Valley, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	San Joaquin Valley, CA - (Extreme)
Marin County	
<i>PM-2.5 (2006)</i>	San Francisco Bay Area, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	San Francisco Bay Area, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	San Francisco Bay Area, CA - (Marginal)
Mariposa County	
<i>8-Hour Ozone (2008)</i>	Mariposa County, CA - (Moderate)
<i>8-Hour Ozone (2015)</i>	Mariposa County, CA - (Moderate)
Merced County	
<i>PM-2.5 (1997)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2006)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2012)</i>	San Joaquin Valley, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	San Joaquin Valley, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	San Joaquin Valley, CA - (Extreme)
Mono County	
<i>PM-10 (1987)</i>	*Mono Basin, CA - (Moderate)
Napa County	
<i>PM-2.5 (2006)</i>	San Francisco Bay Area, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	San Francisco Bay Area, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	San Francisco Bay Area, CA - (Marginal)
Nevada County	
<i>8-Hour Ozone (2008)</i>	*Nevada County (Western part), CA - (Serious)
<i>8-Hour Ozone (2015)</i>	*Nevada County (Western part), CA - (Serious)
Orange County	
<i>PM-2.5 (1997)</i>	Los Angeles-South Coast Air Basin, CA - (Moderate)
<i>PM-2.5 (2006)</i>	Los Angeles-South Coast Air Basin, CA - (Serious)
<i>PM-2.5 (2012)</i>	Los Angeles-South Coast Air Basin, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	Los Angeles-South Coast Air Basin, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	Los Angeles-South Coast Air Basin, CA - (Extreme)
Placer County	
<i>PM-2.5 (2006)</i>	*Sacramento, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	*Sacramento Metro, CA - (Severe 15)
<i>8-Hour Ozone (2015)</i>	*Sacramento Metro, CA - (Serious)
Plumas County	
<i>PM-2.5 (2012)</i>	*Plumas County, CA - (Serious)
Riverside County	
<i>PM-10 (1987)</i>	*Riverside County; Coachella Valley planning area, CA - (Serious)
<i>PM-2.5 (1997)</i>	*Los Angeles-South Coast Air Basin, CA - (Moderate)
<i>PM-2.5 (2006)</i>	*Los Angeles-South Coast Air Basin, CA - (Serious)
<i>PM-2.5 (2012)</i>	*Los Angeles-South Coast Air Basin, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	*Los Angeles-South Coast Air Basin, CA - (Extreme)
<i>8-Hour Ozone (2008)</i>	*Morongo Band of Mission Indians, CA - (Severe 15)
<i>8-Hour Ozone (2008)</i>	*Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	*Riverside County (Coachella Valley), CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	*Los Angeles-South Coast Air Basin, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	*Morongo Band of Mission Indians, CA - (Serious)
<i>8-Hour Ozone (2015)</i>	*Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, CA - (Moderate)
<i>8-Hour Ozone (2015)</i>	*Riverside County (Coachella Valley), CA - (Severe 15)
Sacramento County	
<i>PM-2.5 (2006)</i>	Sacramento, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	Sacramento Metro, CA - (Severe 15)
<i>8-Hour Ozone (2015)</i>	Sacramento Metro, CA - (Serious)
San Bernardino County	
<i>PM-10 (1987)</i>	*San Bernardino County, CA - (Moderate)
<i>PM-10 (1987)</i>	*Trona, CA - (Moderate)
<i>PM-2.5 (1997)</i>	*Los Angeles-South Coast Air Basin, CA - (Moderate)

<i>PM-2.5 (2006)</i>	*Los Angeles-South Coast Air Basin, CA - (Serious)
<i>PM-2.5 (2012)</i>	*Los Angeles-South Coast Air Basin, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	*Los Angeles-San Bernardino Counties (West Mojave Desert), CA - (Severe 15)
<i>8-Hour Ozone (2008)</i>	*Los Angeles-South Coast Air Basin, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	*Los Angeles-San Bernardino Counties (West Mojave Desert), CA - (Severe 15)
<i>8-Hour Ozone (2015)</i>	*Los Angeles-South Coast Air Basin, CA - (Extreme)
San Diego County	
<i>8-Hour Ozone (2008)</i>	*Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	*San Diego County, CA - (Severe 15)
<i>8-Hour Ozone (2015)</i>	*Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, CA - (Moderate)
<i>8-Hour Ozone (2015)</i>	*San Diego County, CA - (Severe 15)
San Francisco County	
<i>PM-2.5 (2006)</i>	San Francisco Bay Area, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	San Francisco Bay Area, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	San Francisco Bay Area, CA - (Marginal)
San Joaquin County	
<i>PM-2.5 (1997)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2006)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2012)</i>	San Joaquin Valley, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	San Joaquin Valley, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	San Joaquin Valley, CA - (Extreme)
San Luis Obispo County	
<i>8-Hour Ozone (2008)</i>	*San Luis Obispo (Eastern San Luis Obispo), CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	*San Luis Obispo (Eastern part), CA - (Marginal)
San Mateo County	
<i>PM-2.5 (2006)</i>	San Francisco Bay Area, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	San Francisco Bay Area, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	San Francisco Bay Area, CA - (Marginal)
Santa Clara County	
<i>PM-2.5 (2006)</i>	San Francisco Bay Area, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	San Francisco Bay Area, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	San Francisco Bay Area, CA - (Marginal)
Solano County	
<i>PM-2.5 (2006)</i>	*Sacramento, CA - (Moderate)
<i>PM-2.5 (2006)</i>	*San Francisco Bay Area, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	*Sacramento Metro, CA - (Severe 15)
<i>8-Hour Ozone (2008)</i>	*San Francisco Bay Area, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	*Sacramento Metro, CA - (Serious)
<i>8-Hour Ozone (2015)</i>	*San Francisco Bay Area, CA - (Marginal)
Sonoma County	
<i>PM-2.5 (2006)</i>	*San Francisco Bay Area, CA - (Moderate)
<i>8-Hour Ozone (2008)</i>	*San Francisco Bay Area, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	*San Francisco Bay Area, CA - (Marginal)
Stanislaus County	
<i>PM-2.5 (1997)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2006)</i>	San Joaquin Valley, CA - (Serious)
<i>PM-2.5 (2012)</i>	San Joaquin Valley, CA - (Serious)
<i>8-Hour Ozone (2008)</i>	San Joaquin Valley, CA - (Extreme)
<i>8-Hour Ozone (2015)</i>	San Joaquin Valley, CA - (Extreme)
Sutter County	
<i>8-Hour Ozone (2008)</i>	*Sacramento Metro, CA - (Severe 15)
<i>8-Hour Ozone (2015)</i>	*Sacramento Metro, CA - (Serious)
<i>8-Hour Ozone (2015)</i>	*Sutter Buttes, CA - (Marginal)
Tehama County	
<i>8-Hour Ozone (2008)</i>	*Tuscan Buttes, CA - (Marginal)
<i>8-Hour Ozone (2015)</i>	*Tuscan Buttes, CA - (Marginal (Rural Transport))
Tulare County	

PM-2.5 (1997) San Joaquin Valley, CA - (Serious)
PM-2.5 (2006) San Joaquin Valley, CA - (Serious)
PM-2.5 (2012) San Joaquin Valley, CA - (Serious)
8-Hour Ozone (2008) San Joaquin Valley, CA - (Extreme)
8-Hour Ozone (2015) San Joaquin Valley, CA - (Extreme)

Tuolumne County

8-Hour Ozone (2015) Tuolumne County, CA - (Marginal)

Ventura County

8-Hour Ozone (2008) *Ventura County, CA - (Serious)

8-Hour Ozone (2015) *Ventura County, CA - (Serious)

Yolo County

PM-2.5 (2006) *Sacramento, CA - (Moderate)

8-Hour Ozone (2008) Sacramento Metro, CA - (Severe 15)

8-Hour Ozone (2015) Sacramento Metro, CA - (Serious)

COLORADO

Adams County

8-Hour Ozone (2008) Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Severe 15)

8-Hour Ozone (2015) Denver Metro/North Front Range, CO - (Serious)

Arapahoe County

8-Hour Ozone (2008) Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Severe 15)

8-Hour Ozone (2015) Denver Metro/North Front Range, CO - (Serious)

Boulder County

8-Hour Ozone (2008) Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Severe 15)

8-Hour Ozone (2015) Denver Metro/North Front Range, CO - (Serious)

Broomfield County

8-Hour Ozone (2008) Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Severe 15)

8-Hour Ozone (2015) Denver Metro/North Front Range, CO - (Serious)

Denver County

8-Hour Ozone (2008) Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Severe 15)

8-Hour Ozone (2015) Denver Metro/North Front Range, CO - (Serious)

Douglas County

8-Hour Ozone (2008) Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Severe 15)

8-Hour Ozone (2015) Denver Metro/North Front Range, CO - (Serious)

Jefferson County

8-Hour Ozone (2008) Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Severe 15)

8-Hour Ozone (2015) Denver Metro/North Front Range, CO - (Serious)

Larimer County

8-Hour Ozone (2008) *Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Severe 15)

8-Hour Ozone (2015) *Denver Metro/North Front Range, CO - (Serious)

Weld County

8-Hour Ozone (2008) *Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Severe 15)

8-Hour Ozone (2015) Denver Metro/North Front Range, CO - (Serious)

CONNECTICUT

Fairfield County

8-Hour Ozone (2008) New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)

8-Hour Ozone (2015) New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)

Hartford County

8-Hour Ozone (2008) Greater Connecticut, CT - (Serious)

8-Hour Ozone (2015) Greater Connecticut, CT - (Serious)

Litchfield County

8-Hour Ozone (2008) Greater Connecticut, CT - (Serious)

8-Hour Ozone (2015) Greater Connecticut, CT - (Serious)

Middlesex County

8-Hour Ozone (2008) New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)

8-Hour Ozone (2015) New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)

New Haven County

8-Hour Ozone (2008) New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)

8-Hour Ozone (2015) New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)

New London County

8-Hour Ozone (2008) Greater Connecticut, CT - (Serious)

8-Hour Ozone (2015) Greater Connecticut, CT - (Serious)

Tolland County*8-Hour Ozone (2008)* Greater Connecticut, CT - (Serious)*8-Hour Ozone (2015)* Greater Connecticut, CT - (Serious)**Windham County***8-Hour Ozone (2008)* Greater Connecticut, CT - (Serious)*8-Hour Ozone (2015)* Greater Connecticut, CT - (Serious)**DELAWARE****New Castle County***8-Hour Ozone (2008)* Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)*8-Hour Ozone (2015)* Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)**Sussex County***8-Hour Ozone (2008)* Seaford, DE - (Marginal)**DISTRICT OF COLUMBIA****District of Columbia***8-Hour Ozone (2015)* Washington, DC-MD-VA - (Moderate)**GUAM****Guam***Sulfur Dioxide (1971)*Piti, GU**Sulfur Dioxide (1971)*Tanguisson, GU**Sulfur Dioxide (2010)*Piti-Cabras, GU***IDAHO****Bannock County***PM-10 (1987)* *Power-Bannock Counties; Fort Hall Indian Reservation, ID - (Moderate)**Power County***PM-10 (1987)* *Power-Bannock Counties; Fort Hall Indian Reservation, ID - (Moderate)**ILLINOIS****Cook County***8-Hour Ozone (2015)* Chicago, IL-IN-WI - (Serious)**DuPage County***8-Hour Ozone (2015)* Chicago, IL-IN-WI - (Serious)**Grundy County***8-Hour Ozone (2015)*Chicago, IL-IN-WI - (Serious)***Kane County***8-Hour Ozone (2015)* Chicago, IL-IN-WI - (Serious)**Kendall County***8-Hour Ozone (2015)*Chicago, IL-IN-WI - (Serious)***Lake County***8-Hour Ozone (2015)* Chicago, IL-IN-WI - (Serious)**Madison County***8-Hour Ozone (2015)* St. Louis, MO-IL - (Serious)**McHenry County***8-Hour Ozone (2015)* Chicago, IL-IN-WI - (Serious)**Monroe County***8-Hour Ozone (2015)* St. Louis, MO-IL - (Serious)**St. Clair County***8-Hour Ozone (2015)* St. Louis, MO-IL - (Serious)**Will County***8-Hour Ozone (2015)* Chicago, IL-IN-WI - (Serious)**INDIANA****Huntington County***Sulfur Dioxide (2010)*Huntington, IN***Lake County***8-Hour Ozone (2015)*Chicago, IL-IN-WI - (Serious)***Porter County***8-Hour Ozone (2015)*Chicago, IL-IN-WI - (Serious)***IOWA****Muscatine County***Sulfur Dioxide (2010)*Muscatine, IA***KANSAS****Saline County***Lead (2008)* *Saline County, KS

KENTUCKY

- Bullitt County
 - 8-Hour Ozone (2015)* Louisville, KY-IN - (Moderate)
- Henderson County
 - Sulfur Dioxide (2010)**Henderson-Webster Counties, KY
- Jefferson County
 - 8-Hour Ozone (2015)* Louisville, KY-IN - (Moderate)
- Oldham County
 - 8-Hour Ozone (2015)* Louisville, KY-IN - (Moderate)
- Webster County
 - Sulfur Dioxide (2010)**Henderson-Webster Counties, KY

LOUISIANA

- Evangeline Parish
 - Sulfur Dioxide (2010)**Evangeline Parish (Partial), LA
- St. Bernard Parish
 - Sulfur Dioxide (2010)* St. Bernard Parish, LA

MARYLAND

- Anne Arundel County
 - Sulfur Dioxide (2010)**Anne Arundel County and Baltimore County, MD
 - 8-Hour Ozone (2008)* Baltimore, MD - (Moderate)
 - 8-Hour Ozone (2015)* Baltimore, MD - (Serious)
- Baltimore County
 - Sulfur Dioxide (2010)**Anne Arundel County and Baltimore County, MD
 - 8-Hour Ozone (2008)* Baltimore, MD - (Moderate)
 - 8-Hour Ozone (2015)* Baltimore, MD - (Serious)
- Baltimore city
 - 8-Hour Ozone (2008)* Baltimore, MD - (Moderate)
 - 8-Hour Ozone (2015)* Baltimore, MD - (Serious)
- Calvert County
 - 8-Hour Ozone (2015)* Washington, DC-MD-VA - (Moderate)
- Carroll County
 - 8-Hour Ozone (2008)* Baltimore, MD - (Moderate)
 - 8-Hour Ozone (2015)* Baltimore, MD - (Serious)
- Cecil County
 - 8-Hour Ozone (2008)* Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)
 - 8-Hour Ozone (2015)* Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)
- Charles County
 - 8-Hour Ozone (2015)* Washington, DC-MD-VA - (Moderate)
- Frederick County
 - 8-Hour Ozone (2015)* Washington, DC-MD-VA - (Moderate)
- Harford County
 - 8-Hour Ozone (2008)* Baltimore, MD - (Moderate)
 - 8-Hour Ozone (2015)* Baltimore, MD - (Serious)
- Howard County
 - 8-Hour Ozone (2008)* Baltimore, MD - (Moderate)
 - 8-Hour Ozone (2015)* Baltimore, MD - (Serious)
- Montgomery County
 - 8-Hour Ozone (2015)* Washington, DC-MD-VA - (Moderate)
- Prince George's County
 - 8-Hour Ozone (2015)* Washington, DC-MD-VA - (Moderate)

MASSACHUSETTS

- Dukes County
 - 8-Hour Ozone (2008)* Dukes County, MA - (Marginal)

MICHIGAN

- Allegan County
 - 8-Hour Ozone (2015)**Allegan County, MI - (Serious)
- Berrien County
 - 8-Hour Ozone (2015)* Berrien County, MI - (Serious)
- Muskegon County
 - 8-Hour Ozone (2015)**Muskegon County, MI - (Serious)
- St. Clair County

*Sulfur Dioxide (2010)**St. Clair, MI

Wayne County

*Sulfur Dioxide (2010)**Detroit, MI

MINNESOTA

Dakota County

Lead (2008) *Eagan, MN

MISSOURI

Dent County

Lead (2008) *Iron, Dent, and Reynolds Counties, MO

Franklin County

8-Hour Ozone (2015) *St. Louis, MO-IL - (Serious)

Iron County

Lead (2008) *Iron, Dent, and Reynolds Counties, MO

Jefferson County

Lead (1978) *Jefferson County (part); Herculaneum, MO

Lead (2008) *Jefferson County, MO

8-Hour Ozone (2015) St. Louis, MO-IL - (Serious)

New Madrid County

*Sulfur Dioxide (2010)**New Madrid County, MO

Reynolds County

Lead (2008) *Iron, Dent, and Reynolds Counties, MO

St. Charles County

8-Hour Ozone (2015) St. Louis, MO-IL - (Serious)

St. Louis County

8-Hour Ozone (2015) St. Louis, MO-IL - (Serious)

St. Louis city

8-Hour Ozone (2015) St. Louis, MO-IL - (Serious)

MONTANA

Lake County

PM-10 (1987) *Lake County; Polson, MT - (Moderate)

PM-10 (1987) *Lake County; Ronan, MT - (Moderate)

Rosebud County

PM-10 (1987) *Rosebud County; Lame Deer, MT - (Moderate)

Yellowstone County

*Sulfur Dioxide (1971)**Laurel Area (Yellowstone County), MT

NEVADA

Clark County

8-Hour Ozone (2015) *Las Vegas, NV - (Serious)

NEW JERSEY

Atlantic County

8-Hour Ozone (2008) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)

8-Hour Ozone (2015) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)

Bergen County

8-Hour Ozone (2008) New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)

8-Hour Ozone (2015) New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)

Burlington County

8-Hour Ozone (2008) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)

8-Hour Ozone (2015) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)

Camden County

8-Hour Ozone (2008) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)

8-Hour Ozone (2015) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)

Cape May County

8-Hour Ozone (2008) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)

8-Hour Ozone (2015) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)

Cumberland County

8-Hour Ozone (2008) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)

8-Hour Ozone (2015) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)

Essex County

8-Hour Ozone (2008) New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)

8-Hour Ozone (2015) New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)

Gloucester County

	<i>8-Hour Ozone (2008)</i>	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)
	<i>8-Hour Ozone (2015)</i>	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)
Hudson County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Hunterdon County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Mercer County		
	<i>8-Hour Ozone (2008)</i>	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)
	<i>8-Hour Ozone (2015)</i>	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)
Middlesex County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Monmouth County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Morris County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Ocean County		
	<i>8-Hour Ozone (2008)</i>	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)
	<i>8-Hour Ozone (2015)</i>	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)
Passaic County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Salem County		
	<i>8-Hour Ozone (2008)</i>	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)
	<i>8-Hour Ozone (2015)</i>	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)
Somerset County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Sussex County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Union County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Warren County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
NEW MEXICO		
Dona Ana County		
	<i>PM-10 (1987)</i>	*Dona Ana County; Anthony, NM - (Moderate)
	<i>8-Hour Ozone (2015)</i>	*El Paso-Las Cruces, TX-NM - (Marginal)
NEW YORK		
Bronx County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Chautauqua County		
	<i>8-Hour Ozone (2008)</i>	Jamestown, NY - (Marginal)
Kings County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
Nassau County		
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)
New York County		
	<i>PM-10 (1987)</i>	New York County, NY - (Moderate)
	<i>8-Hour Ozone (2008)</i>	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)

Queens County*8-Hour Ozone (2008)* New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)*8-Hour Ozone (2015)* New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)**Richmond County***8-Hour Ozone (2008)* New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)*8-Hour Ozone (2015)* New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)**Rockland County***8-Hour Ozone (2008)* New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)*8-Hour Ozone (2015)* New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)**St. Lawrence County***Sulfur Dioxide (2010)**St. Lawrence County, NY**Suffolk County***8-Hour Ozone (2008)* New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)*8-Hour Ozone (2015)* New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)**Westchester County***8-Hour Ozone (2008)* New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)*8-Hour Ozone (2015)* New York-Northern New Jersey-Long Island, NY-NJ-CT - (Serious)**OHIO****Cuyahoga County***8-Hour Ozone (2015)* Cleveland, OH - (Serious)**Geauga County***8-Hour Ozone (2015)* Cleveland, OH - (Serious)**Lake County***8-Hour Ozone (2015)* Cleveland, OH - (Serious)**Lorain County***8-Hour Ozone (2015)* Cleveland, OH - (Serious)**Medina County***8-Hour Ozone (2015)* Cleveland, OH - (Serious)**Morgan County***Sulfur Dioxide (2010)**Muskingum River, OH**Portage County***8-Hour Ozone (2015)* Cleveland, OH - (Serious)**Stark County***Lead (2008)* *Canton-Stark County, OH**Summit County***8-Hour Ozone (2015)* Cleveland, OH - (Serious)**Washington County***Sulfur Dioxide (2010)**Muskingum River, OH**OREGON****Klamath County***PM-2.5 (2006)* *Klamath Falls, OR - (Moderate)**PENNSYLVANIA****Allegheny County***PM-2.5 (2012)* Allegheny County, PA - (Moderate)*8-Hour Ozone (2008)* Pittsburgh-Beaver Valley, PA - (Marginal)**Armstrong County***Sulfur Dioxide (1971)**Armstrong County: Madison, Mahoning, Boggs, Washington, Pine, PA*Sulfur Dioxide (2010)**Indiana, PA*8-Hour Ozone (2008)* Pittsburgh-Beaver Valley, PA - (Marginal)**Beaver County***Lead (2008)* *Lower Beaver Valley, PA*Sulfur Dioxide (2010)**Beaver, PA*8-Hour Ozone (2008)* Pittsburgh-Beaver Valley, PA - (Marginal)**Berks County***Lead (2008)* *Lyons, PA*Lead (2008)* *North Reading, PA*8-Hour Ozone (2008)* Reading, PA - (Marginal)**Bucks County***8-Hour Ozone (2008)* Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)*8-Hour Ozone (2015)* Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)**Butler County**

8-Hour Ozone (2008) Pittsburgh-Beaver Valley, PA - (Marginal)
 Cambria County
*Sulfur Dioxide (2010)** Cambria-Westmoreland Area, PA
 Carbon County
8-Hour Ozone (2008) Allentown-Bethlehem-Easton, PA - (Marginal)
 Chester County
8-Hour Ozone (2008) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)
8-Hour Ozone (2015) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)
 Delaware County
8-Hour Ozone (2008) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)
8-Hour Ozone (2015) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)
 Fayette County
8-Hour Ozone (2008) Pittsburgh-Beaver Valley, PA - (Marginal)
 Indiana County
Sulfur Dioxide (2010) Indiana, PA
 Lancaster County
8-Hour Ozone (2008) Lancaster, PA - (Marginal)
 Lehigh County
8-Hour Ozone (2008) Allentown-Bethlehem-Easton, PA - (Marginal)
 Montgomery County
8-Hour Ozone (2008) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)
8-Hour Ozone (2015) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)
 Northampton County
8-Hour Ozone (2008) Allentown-Bethlehem-Easton, PA - (Marginal)
 Philadelphia County
8-Hour Ozone (2008) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Marginal)
8-Hour Ozone (2015) Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE - (Serious)
 Warren County
*Sulfur Dioxide (2010)** Warren, PA
 Washington County
8-Hour Ozone (2008) Pittsburgh-Beaver Valley, PA - (Marginal)
 Westmoreland County
*Sulfur Dioxide (2010)** Cambria-Westmoreland Area, PA
8-Hour Ozone (2008) Pittsburgh-Beaver Valley, PA - (Marginal)

PUERTO RICO

Arecibo Municipio
Lead (2008) *Arecibo, PR
 Bayamon Municipio
*Sulfur Dioxide (2010)** San Juan, PR
 Catano Municipio
Sulfur Dioxide (2010) San Juan, PR
 Guaynabo Municipio
*Sulfur Dioxide (2010)** San Juan, PR
 Salinas Municipio
*Sulfur Dioxide (2010)** Guayama-Salinas, PR
 San Juan Municipio
*Sulfur Dioxide (2010)** San Juan, PR
 Toa Baja Municipio
*Sulfur Dioxide (2010)** San Juan, PR

TENNESSEE

Sullivan County
*Sulfur Dioxide (2010)** Sullivan County, TN

TEXAS

Anderson County
*Sulfur Dioxide (2010)** Freestone and Anderson Counties, TX
 Bexar County
8-Hour Ozone (2015) San Antonio, TX - (Serious)
 Brazoria County
8-Hour Ozone (2008) Houston-Galveston-Brazoria, TX - (Severe 15)
8-Hour Ozone (2015) Houston-Galveston-Brazoria, TX - (Serious)
 Chambers County

	<i>8-Hour Ozone (2008)</i>	Houston-Galveston-Brazoria, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Houston-Galveston-Brazoria, TX - (Serious)
Collin County		
	<i>8-Hour Ozone (2008)</i>	Dallas-Fort Worth, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Dallas-Fort Worth, TX - (Serious)
Dallas County		
	<i>8-Hour Ozone (2008)</i>	Dallas-Fort Worth, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Dallas-Fort Worth, TX - (Serious)
Denton County		
	<i>8-Hour Ozone (2008)</i>	Dallas-Fort Worth, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Dallas-Fort Worth, TX - (Serious)
El Paso County		
	<i>PM-10 (1987)</i>	*El Paso County, TX - (Moderate)
	<i>8-Hour Ozone (2015)</i>	El Paso-Las Cruces, TX-NM - (Marginal)
Ellis County		
	<i>8-Hour Ozone (2008)</i>	Dallas-Fort Worth, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Dallas-Fort Worth, TX - (Serious)
Fort Bend County		
	<i>8-Hour Ozone (2008)</i>	Houston-Galveston-Brazoria, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Houston-Galveston-Brazoria, TX - (Serious)
Freestone County		
	<i>Sulfur Dioxide (2010)</i>	*Freestone and Anderson Counties, TX
Galveston County		
	<i>8-Hour Ozone (2008)</i>	Houston-Galveston-Brazoria, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Houston-Galveston-Brazoria, TX - (Serious)
Harris County		
	<i>8-Hour Ozone (2008)</i>	Houston-Galveston-Brazoria, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Houston-Galveston-Brazoria, TX - (Serious)
Howard County		
	<i>Sulfur Dioxide (2010)</i>	*Howard County, TX
Hutchinson County		
	<i>Sulfur Dioxide (2010)</i>	*Hutchinson County, TX
Johnson County		
	<i>8-Hour Ozone (2008)</i>	Dallas-Fort Worth, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Dallas-Fort Worth, TX - (Serious)
Kaufman County		
	<i>8-Hour Ozone (2008)</i>	Dallas-Fort Worth, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Dallas-Fort Worth, TX - (Serious)
Liberty County		
	<i>8-Hour Ozone (2008)</i>	Houston-Galveston-Brazoria, TX - (Severe 15)
Montgomery County		
	<i>8-Hour Ozone (2008)</i>	Houston-Galveston-Brazoria, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Houston-Galveston-Brazoria, TX - (Serious)
Navarro County		
	<i>Sulfur Dioxide (2010)</i>	*Navarro County, TX
Panola County		
	<i>Sulfur Dioxide (2010)</i>	*Rusk and Panola Counties, TX
Parker County		
	<i>8-Hour Ozone (2008)</i>	Dallas-Fort Worth, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Dallas-Fort Worth, TX - (Serious)
Rockwall County		
	<i>8-Hour Ozone (2008)</i>	Dallas-Fort Worth, TX - (Severe 15)
Rusk County		
	<i>Sulfur Dioxide (2010)</i>	*Rusk and Panola Counties, TX
Tarrant County		
	<i>8-Hour Ozone (2008)</i>	Dallas-Fort Worth, TX - (Severe 15)
	<i>8-Hour Ozone (2015)</i>	Dallas-Fort Worth, TX - (Serious)
Titus County		
	<i>Sulfur Dioxide (2010)</i>	*Titus County, TX
Waller County		
	<i>8-Hour Ozone (2008)</i>	Houston-Galveston-Brazoria, TX - (Severe 15)

Wise County

8-Hour Ozone (2008) Dallas-Fort Worth, TX - (Severe 15)

8-Hour Ozone (2015) Dallas-Fort Worth, TX - (Serious)

UTAH

Box Elder County

PM-2.5 (2006) *Salt Lake City, UT - (Serious)

Davis County

PM-2.5 (2006) Salt Lake City, UT - (Serious)

8-Hour Ozone (2015) Northern Wasatch Front, UT - (Serious)

Duchesne County

8-Hour Ozone (2015) *Uinta Basin, UT - (Moderate)

Salt Lake County

PM-2.5 (2006) Salt Lake City, UT - (Serious)

Sulfur Dioxide (1971) Salt Lake County, UT

8-Hour Ozone (2015) Northern Wasatch Front, UT - (Serious)

Tooele County

PM-2.5 (2006) *Salt Lake City, UT - (Serious)

Sulfur Dioxide (1971) *Tooele County, UT

8-Hour Ozone (2015) *Northern Wasatch Front, UT - (Serious)

Uintah County

8-Hour Ozone (2015) *Uinta Basin, UT - (Moderate)

Utah County

PM-2.5 (2006) *Provo, UT - (Serious)

8-Hour Ozone (2015) *Southern Wasatch Front, UT - (Marginal)

Weber County

PM-2.5 (2006) *Salt Lake City, UT - (Serious)

8-Hour Ozone (2015) *Northern Wasatch Front, UT - (Serious)

VIRGINIA

Alexandria city

8-Hour Ozone (2015) Washington, DC-MD-VA - (Moderate)

Arlington County

8-Hour Ozone (2015) Washington, DC-MD-VA - (Moderate)

Fairfax County

8-Hour Ozone (2015) Washington, DC-MD-VA - (Moderate)

Fairfax city

8-Hour Ozone (2015) Washington, DC-MD-VA - (Moderate)

Falls Church city

8-Hour Ozone (2015) Washington, DC-MD-VA - (Moderate)

Giles County

Sulfur Dioxide (2010) *Giles County, VA

Loudoun County

8-Hour Ozone (2015) Washington, DC-MD-VA - (Moderate)

Manassas Park city

8-Hour Ozone (2015) Washington, DC-MD-VA - (Moderate)

Manassas city

8-Hour Ozone (2015) Washington, DC-MD-VA - (Moderate)

Prince William County

8-Hour Ozone (2015) Washington, DC-MD-VA - (Moderate)

WISCONSIN

Kenosha County

8-Hour Ozone (2015) *Chicago, IL-IN-WI - (Serious)

Milwaukee County

8-Hour Ozone (2015) Milwaukee, WI - (Serious)

Ozaukee County

8-Hour Ozone (2015) Milwaukee, WI - (Serious)

Racine County

8-Hour Ozone (2015) *Milwaukee, WI - (Serious)

Sheboygan County

8-Hour Ozone (2015) *Sheboygan County, WI - (Serious)

Washington County

8-Hour Ozone (2015) *Milwaukee, WI - (Serious)

Waukesha County

8-Hour Ozone (2015) *Milwaukee, WI - (Serious)

WYOMING

Lincoln County

8-Hour Ozone (2008) *Upper Green River Basin Area, WY - (Marginal)

Sublette County

8-Hour Ozone (2008) Upper Green River Basin Area, WY - (Marginal)

Sweetwater County

8-Hour Ozone (2008) *Upper Green River Basin Area, WY - (Marginal)

Discover.

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2025-10-31

Attachments E –

**Consistency with Texas Coastal Zone Management
Program Form and Correspondence with GLO**



CITY OF CORPUS CHRISTI
OFFICE OF THE MAYOR
PAULETTE M. GUAJARDO

December 15, 2025

General Land Office
Coastal Management Program
P.O. Box 12873
Austin, TX 78711-2873
federal.consistency@glo.texas.gov

**Re: Consistency Review Requested for Federally Funded Project
HUD Assisted Project – Grant Number 24-065-091-E767
Greenwood WWTP Flood Mitigation & Backup Generator**

Dear Reviewer,

The City of Corpus Christi is pursuing federal funding through the U.S. Department of Housing and Urban Development CDBG-MIT program for flood mitigation improvements and installation of backup generators at the existing Greenwood Wastewater Treatment Plant located at 6541 Greenwood Drive, Corpus Christi, Texas. The purpose of this coordination is to determine consistency of the project with the Texas Coastal Management Program. A Consistency with the Texas Coastal Management Program form and a location map are included as attachments to this letter.

The project involves installation of emergency generators and flood mitigation improvements at the Greenwood Wastewater Treatment Plant. The major improvements include installation of emergency generators, instrumentation and electrical control system for automatic switch between grid power and emergency generators, miscellaneous improvements related to the emergency generators, site grading, piping and floodway improvements, flood walls for identified plant structures, a new effluent pump station of firm capacity up to 36 MGD, and miscellaneous improvements related to flood mitigation improvements. The improvements are not anticipated to affect coastal resources.

Please provide any comments you may have regarding the project in regard to your agency's jurisdictional requirements for allowing the project to proceed.

If you have any questions, comments, or need additional information, please contact me at (361) 826-3100 or by e-mail at paulette.guajardo@corpuschristitx.gov.

Sincerely,

Paulette M. Guajardo

Mayor, City of Corpus Christi

Enclosures: Consistency with the Texas Coastal Management Program Form Location Map

CONSISTENCY WITH THE TEXAS COASTAL MANAGEMENT PROGRAM

THE APPLICANT SHOULD SIGN THIS STATEMENT AND RETURN WITH APPLICATION PACKET TO:

TEXAS GENERAL LAND OFFICE
COASTAL RESOURCES-FEDERAL CONSISTENCY
1700 NORTH CONGRESS AVENUE, ROOM 330
AUSTIN, TEXAS 78701-1495
federal.consistency@glo.texas.gov

FOR USACE USE ONLY:

PERMIT #: _____

PROJECT MGR: _____

APPLICANT'S NAME AND ADDRESS (PLEASE PRINT):

Title First Last Suffix

Mailing Address Home

City State Zip Code Work

Country Email Mobile

Fax

The Texas Coastal Management Program (CMP) coordinates state, local, and federal programs for the management of Texas coastal resources. Activities within the CMP boundary must comply with the enforceable policies of the Texas Coastal Management Program and be conducted in a manner consistent with those policies. The boundary definition is contained in the CMP rules (31 TAC §27.1).

- To determine whether your proposed activity lies within the CMP boundary, please contact GLO Federal Consistency Staff at federal.consistency@glo.texas.gov

PROJECT DESCRIPTION:

Is the proposed activity at a waterfront site or within coastal, tidal, or navigable waters? Yes No

If Yes, name affected coastal, tidal, or navigable waters: N/A

Is the proposed activity water dependent? Yes No (31 TAC §26.3(a)(14))

<https://tinyurl.com/TXCMPdefinitions>

Please briefly describe the project and all possible effects on coastal resources:

The project involves installation of emergency generators and flood mitigation improvements to the Greenwood Wastewater Treatment Plant. The major improvements include installation of emergency generators, instrumentation and electrical control system for automatic switch between grid power and emergency generators, miscellaneous improvements related to the emergency generators, site grading, piping and floodway improvements, flood walls for identified plant structures, a new effluent pump station of firm capacity up to 36 MGD, and miscellaneous improvements related to flood mitigation improvements. The improvements are not anticipated to affect coastal resources.

Indicate area of impact: 2 acres or square feet

ADDITIONAL PERMITS/ AUTHORIZATIONS REQUIRED:

- Coastal Easement - Date application submitted: _____
- Coastal Lease - Date application submitted: _____
- Stormwater Permit- Date application submitted: _____
- Water Quality Certification - Date application submitted: _____
- Other state/federal/local permits/authorizations required:

The Greenwood WWTP is an existing WWTP and has a Texas Pollutant Discharge Elimination System (TPDES) discharge permit (WQ0010401003), a stormwater discharge permit (TXR05DM76), and a wastewater authorization (R10401003).

The proposed activity must not adversely affect coastal natural resource areas (CNRAs).

PLEASE CHECK ALL COASTAL NATURAL RESOURCE AREAS THAT MAY BE AFFECTED:

- | | | |
|---|---|---|
| <input type="checkbox"/> Coastal Barriers | <input type="checkbox"/> Critical Erosion Areas | <input type="checkbox"/> Submerged Lands |
| <input type="checkbox"/> Coastal Historic Areas | <input type="checkbox"/> Gulf Beaches | <input type="checkbox"/> Submerged Aquatic Vegetation |
| <input type="checkbox"/> Coastal Preserves | <input type="checkbox"/> Hard Substrate Reefs | <input type="checkbox"/> Tidal Sand or Mud Flats |
| <input type="checkbox"/> Coastal Shore Areas | <input type="checkbox"/> Oyster Reefs | <input type="checkbox"/> Waters of Gulf of Mexico |
| <input type="checkbox"/> Coastal Wetlands | <input type="checkbox"/> Special Hazard Areas | <input type="checkbox"/> Waters Under Tidal Influence |
| <input type="checkbox"/> Critical Dune Areas | | |

The applicant affirms that the proposed activity, its associated facilities, and their probable effects comply with the relevant enforceable policies of the CMP, and that the proposed activity will be conducted in a manner consistent with such policies.

PLEASE CHECK ALL APPLICABLE ENFORCEABLE POLICIES:

<https://tinyurl.com/TXCMPpolicies>

<input type="checkbox"/>	§26.15 Policy for Major Actions
<input type="checkbox"/>	§26.16 Policies for Construction of Electric Generating and Transmission Facilities
<input type="checkbox"/>	§26.17 Policies for Construction, Operation, and Maintenance of Oil and Gas Exploration and Production Facilities
<input type="checkbox"/>	§26.18 Policies for Discharges of Wastewater and Disposal of Waste from Oil and Gas Exploration and Production Activities
<input type="checkbox"/>	§26.19 Policies for Construction and Operation of Solid Waste Treatment, Storage, and Disposal Facilities
<input type="checkbox"/>	§26.20 Policies for Prevention, Response and Remediation of Oil Spills
<input checked="" type="checkbox"/>	§26.21 Policies for Discharge of Municipal and Industrial Wastewater to Coastal Waters
<input type="checkbox"/>	§26.22 Policies for Nonpoint Source (NPS) Water Pollution
<input type="checkbox"/>	§26.23 Policies for Development in Critical Areas
<input type="checkbox"/>	§26.24 Policies for Construction of Waterfront Facilities and Other Structures on Submerged Lands
<input type="checkbox"/>	§26.25 Policies for Dredging and Dredged Material Disposal and Placement
<input type="checkbox"/>	§26.26 Policies for Construction in the Beach/Dune System
<input type="checkbox"/>	§26.27 Policies for Development in Coastal Hazard Areas
<input type="checkbox"/>	§26.28 Policies for Development Within Coastal Barrier Resource System Units and Otherwise Protected Areas on Coastal Barriers
<input type="checkbox"/>	§26.29 Policies for Development in State Parks, Wildlife Management Areas or Preserves
<input type="checkbox"/>	§26.30 Policies for Alteration of Coastal Historic Areas
<input type="checkbox"/>	§26.31 Policies for Transportation Projects
<input type="checkbox"/>	§26.32 Policies for Emission of Air Pollutants
<input type="checkbox"/>	§26.33 Policies for Appropriations of Water
<input type="checkbox"/>	§26.34 Policies for Levee and Flood Control Projects

Please explain how the proposed project is consistent with the applicable enforceable policies identified above. Please use additional sheets if necessary. *For example: If you are constructing a pier with a covered boathouse, then the applicable enforceable policy is: §26.24 Policies for Construction of Waterfront Facilities and Other Structures on Submerged Lands. The project is consistent because it will not interfere with navigation, natural coastal processes, and avoids/minimizes shading.*

The Greenwood WWTP is an existing WWTP authorized to discharge municipal wastewater to La Volla Creek under TPDES Permit Number WQ0010401003. The permit includes effluent limitations that the facility must comply with. The project involves installation of emergency generators and flood mitigation improvements to some treatment units at the WWTP. The project will not include any new outfalls, will not cause an increase in permitted flow, and will not result in an increase in pollutant loads to coastal waters.

BY SIGNING THIS STATEMENT, THE APPLICANT IS STATING THAT THE PROPOSED ACTIVITY COMPLIES WITH THE TEXAS COASTAL MANAGEMENT PROGRAM AND WILL BE CONDUCTED IN A MANNER CONSISTENT WITH SUCH PROGRAM



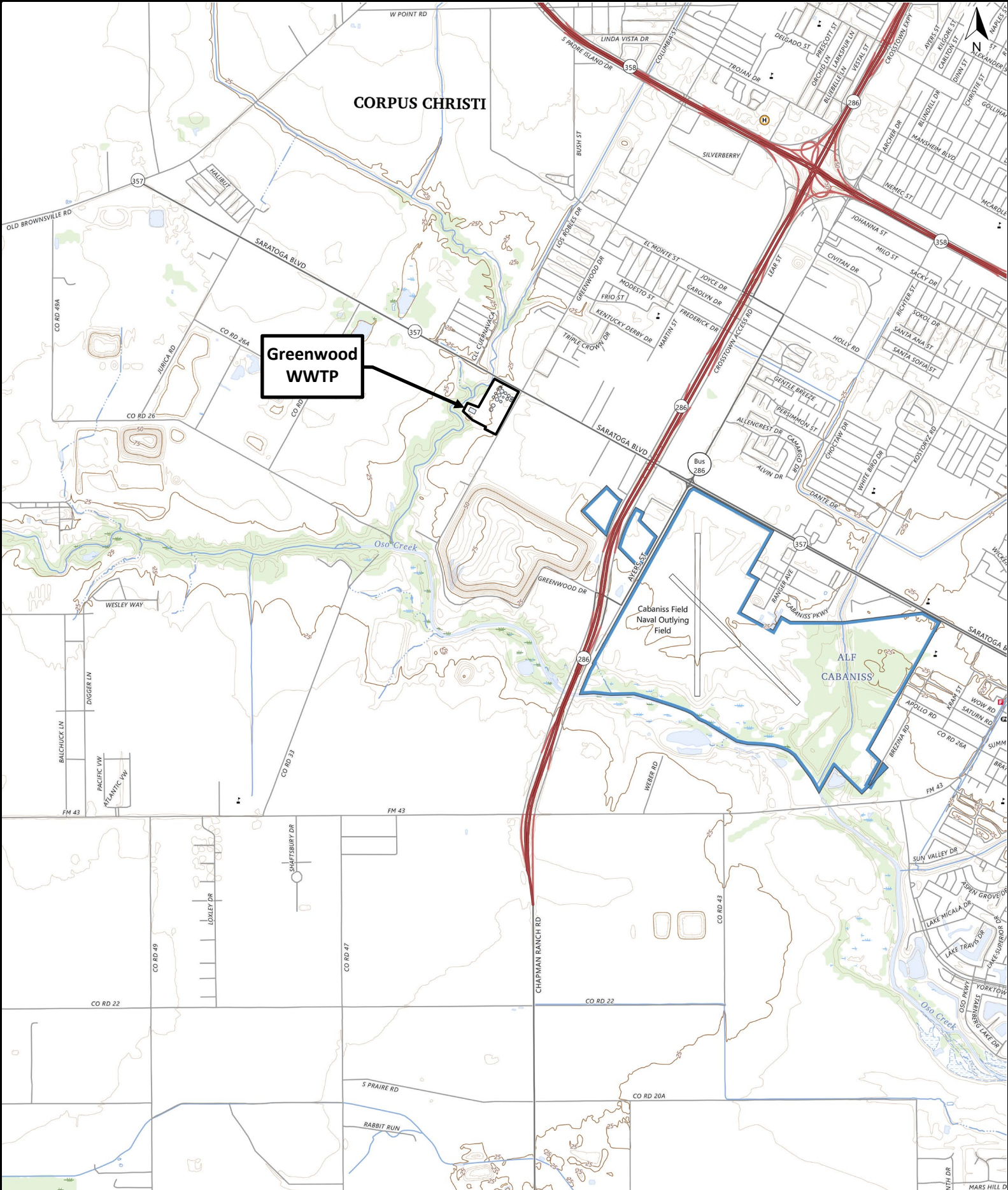
Signature of Applicant/Agent

Date

Any questions regarding the Texas Coastal Management Program should be referred to:

Texas General Land Office
Coastal Resources Division
1700 North Congress Avenue, Room 330
Austin, Texas 78701-1495
Phone: (512) 463-7497
Toll Free: 1-800-998-4GLO
federal.consistency@glo.texas.gov

Print Form



**Greenwood
WWTP**

Note: Property Location Shown is Approximate.



Drawn/Checked By:	TLD	Scale:	1" = 3,270'
Project Number:	24L0174A_04	Date:	10/6/25

Project Location Map
 Greenwood WWTP
 6541 Greenwood Drive, Corpus Christi,
 Nueces County, Texas

From: [Leslie Koza](#)
To: [Tara Ducrest](#)
Subject: Re: Consistency review for Grant Number 24-065-091-E767
Date: Thursday, December 18, 2025 8:57:47 AM

EXTERNAL SENDER STOP.THINK.QUESTION If this is unexpected, verify before you click links or open attachments.

Tara,
The GLO Coastal Management Program does not currently have any listed federal financial assistance activities, so a federal consistency review is not required. Please feel free to contact me if you have any questions.

Thanks,
Leslie Koza
Federal Consistency Coordinator
512-463-7497
leslie.koza@glo.texas.gov
Federal.Consistency@glo.texas.gov
Texas General Land Office
Commissioner Dawn Buckingham, M.D.

From: Tara Ducrest <TDucrest@hanson-inc.com>
Sent: Tuesday, December 16, 2025 4:55 PM
To: Federal Consistency <Federal.Consistency@GLO.TEXAS.GOV>
Cc: William Causey <williamc8@corpuschristitx.gov>
Subject: [EXTERNAL] Consistency review for Grant Number 24-065-091-E767

You don't often get email from tducrest@hanson-inc.com. [Learn why this is important](#)

Dear Reviewer,
The City of Corpus Christi is pursuing funding through the US HUD CDBG-MIT program for flood mitigation and installation of emergency generators at the Greenwood Wastewater Treatment Plant and installation of emergency generators at the Oso Wastewater Treatment Plant. A Consistency with the Texas Coastal Management Program form and a location map for each site are attached. Please provide any comments you have regarding these projects.

Thank you,

Logo



Tara Ducrest | *Environmental Scientist*
[Hanson Professional Services Inc.](#) | 4501 Gollihar | Corpus Christi, TX 78411
w 361-414-6487 | c 361-215-3282 | [Facebook](#) | [Twitter](#) | [LinkedIn](#)

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Mail delivered by Hanson Professional Services Inc. mail system.

**Attachment F –
Narrative Portion of Phase I ESA prepared for
Greenwood WWTP**

Executive Summary

Hanson Professional Services Inc. (Hanson) conducted a Phase I Environmental Site Assessment (ESA) for the City of Corpus Christi Greenwood Wastewater Treatment Plant (WWTP) located at 6541 Greenwood Drive in Corpus Christi, Nueces County, Texas. The ESA was performed in general accordance with the requirements for the American Society for Testing Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, Designation E1527-21.

The subject property is located southwest of the intersection of Greenwood Drive and Saratoga Boulevard in Corpus Christi, Nueces County, Texas 78417. Currently, the subject property is occupied by the City of Corpus Christi Greenwood WWTP. Several wastewater treatment units are present on the subject property, including a lift station, influent structure, primary clarifiers, aeration basins, final clarifiers, effluent filters, ultraviolet disinfection basins, an effluent structure, a dissolved air flotation thickening unit, primary anaerobic digesters, a secondary anaerobic digester, a sludge dewatering facility, and sludge drying beds. An office for the WWTP is present on the east side of the subject property and an old office building is present on the north side of the subject property. Two emergency generators are present, one is near the blower building in the southeast portion of the WWTP and one is near the control room in the northwest portion of the WWTP. The out of use sludge drying beds and an out of use supernatant lagoon are fenced off on the south portion of the subject property. The sludge drying beds were overgrown with vegetation and some of the beds appeared to have piles of dried sludge present. Two pad-mounted transformers were observed between the sludge drying beds and the blower room. No markings were observed to indicate that the units did not contain Polychlorinated Biphenyls (PCBs). Two portable buildings and a storage container are present in the southwest portion of the WWTP. A storage area for trailers, portable diesel power systems, fuel storage containers, and spare pumps was observed in the north-central portion of the WWTP. Buckets of hydraulic oil and syn lube were observed in a storage room on the east end of the influent structure. A workshop and storage area were present inside the maintenance building. A fenced off area with utility boxes for underground AT&T cables and a residential gas meter was observed in the northeast portion of the subject property. Drums of Micro-Solve Grease and Odor Control were present on pallets outside of the maintenance building. Dumpsters for sludge storage were observed in the sludge dewatering building. Containers of Clarifloc CE-454 were observed near the sludge dewatering building. Electric distribution lines are present along the north, east, and west sides of the subject property and crossing the south portion of the subject property.

The WWTP on the subject property has been in operation since 1957. Prior to 1957, the subject property appears to have been used as farmland since at least the 1930s. A home appears to have been on the subject property in the 1950s.

Saratoga Boulevard and farmland are present to the north of the subject property. To the east, Greenwood Drive, farmland, and Legacy Sports fields are present. Undeveloped land, horse stables, Voss Engineering, and VLS Texas Molecular are present to the south of the subject property. To the west, undeveloped land, La Volla Creek, and Peewee's Pet Adoption are present.

Information pertaining to potential environmental liabilities resulting from the treating, storing, disposing, discharging, or emitting of hazardous and/or regulated substances was obtained by Hanson through ERIS. Twenty database findings were reported for the subject property for ERIS IDs 1, 2, and 3. The findings were in the Notice of Violation (NOV), Notices of Enforcement (NOE), Court Orders & Administrative Orders (ORD), Facility Registry Service/Facility Index (FINDS/FRS), Integrated Compliance Information System

(ICIS), Spills (SPILLS), and Tier 2 Report (TIER2) databases. The wastewater treatment plant operations at the subject property are a recognized environmental condition (REC).

ERIS identified 15 sites within the ASTM search radius beyond the subject property boundary. Based on the available database information and the proximity and physical setting of the identified sites, they are not considered to be RECs.

Oil, gas, and water well records from ERIS were reviewed for the subject property and surrounding land. No wells were identified on the subject property. Sixty-one well locations were identified within one mile of the subject property. The nearest well identified was a permitted location for a cathodic well approximately 263 feet north of the subject property. One natural gas pipeline operated by South Shore Pipeline L.P. and a City of Corpus Christi residential gas pipeline were identified along the north boundary of the subject property. A residential gas pipeline was also identified in the northeast portion of the subject property. Railroad Commission of Texas (RRC) H-8 loss reports were reviewed, and no loss incidents were reported for the pipelines on or near the subject property from 2009 to 2025.

No stained soil or stressed vegetation were observed on the subject property during the site visit. Other than the treatment units associated with operation of the Greenwood WWTP, no waste disposal pits, ponds, or lagoons were observed on the subject property during the site visit.

Findings

Our review of site information and a property inspection revealed the following potential environmental liabilities associated with the subject property:

On-Site RECs:

- *Possible Presence of Contamination from Operation of WWTP on Subject Property* – The WWTP on the subject property has been in operation since 1957. Wastewater treatment and sludge management have occurred at the WWTP. This site could potentially be a REC due to the possible presence of contamination from metals, PCBs, and Per- and Polyfluoroalkyl Substances (PFAS). In addition, violations have occurred at the WWTP, including failure to properly operate and maintain all facilities and systems of treatment and control, failure to ensure that the plant and all of its systems of collection, treatment, and disposal are properly operated and maintained, and failure to prevent the discharge of sewage into or adjacent to any water in the state. An unauthorized discharge of 10,000 gallons of wastewater occurred at the bar screen on February 15, 2006.

Recommendations

Due to the site being an active wastewater treatment plant, a Phase II Environmental Site Assessment is not currently recommended. In the event that the Greenwood WWTP were to be decommissioned, assessment for potential contamination of the subject property would be recommended.

1. Introduction

Hanson Professional Services Inc. conducted a Phase I Environmental Site Assessment (ESA) for the City of Corpus Christi Greenwood Wastewater Treatment Plant (WWTP) located at 6541 Greenwood Drive in Corpus Christi, Nueces County, Texas. The ESA was conducted for the City of Corpus Christi.

1.1. Purpose

The ESA was performed in general conformance with the requirements of the American Society for Testing Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, Designation E1527-21 unless specifically noted in the report. This Standard Practice was developed to address the scope of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) in order to qualify for the innocent landowner's defense to CERCLA liability. The purpose of this ESA was to assist the client in developing information to identify recognized environmental conditions (RECs) in connection with the site as reflected by the scope of this report. This purpose was undertaken through user-provided information, a regulatory database review, historical and physical records review, and a visual non-invasive reconnaissance of the subject property and adjoining properties.

1.2. Special Terms and Conditions

Hanson Professional Services Inc. has performed this ESA for the City of Corpus Christi for the above stated purpose. This study may not contain sufficient information for other purposes or entities. Reference is made in this ESA to public records provided by an information source. No warranty, expressed or implied, is made as to the accuracy of those public records or the accuracy of the information source providing the public records.

1.3. General Limitations

The assessment of subsurface conditions at the subject property was beyond the scope of services for this ESA.

This report does not constitute a property condition assessment since it was prepared principally to address environmental contaminant issues. It does not constitute an asbestos inspection, lead based paint survey, mold inspection, wetland delineation, or other specific type of environmental assessment tied directly to a specific local, state, or federal environmental regulatory program.

A chain of title search was not performed for this Phase I ESA.

1.4. Information Sources

The information pertaining to this ESA was obtained from the following sources:

Table 1-1 – Information Sources

1.	Organization Name:	ERIS
	Web Site Address:	http://www.order.erisinfo.com/home
	Telephone Number:	(866) 517-5204
	Information Obtained:	Aerial photos, historical topo maps, city directory search, fire insurance maps, database report, & environmental lien search
2.	Organization Name:	Nueces County Appraisal District
	Web Site Address:	https://gis.bisclient.com/nuecescad/
	Information Obtained:	Property parcel description
3.	Organization Name:	Railroad Commission of Texas
	Web Site Address:	https://gis.rrc.texas.gov/GISViewer/
	Information Obtained:	Records on commercial waste disposal sites, oil and gas exploration, and pipelines
4.	Organization Name:	Federal Emergency Management Agency
	Web Site Address:	https://msc.fema.gov/portal
	Information Obtained:	Floodplain map
5.	Organization Name:	United States Department of Agriculture
	Web Site Address:	https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx
	Information Obtained:	Soil information
6.	Organization Name:	Texas Commission on Environmental Quality
	Web Site Address:	https://www15.tceq.texas.gov/crpub/index.cfm?fuseaction=home.welcome
	Information Obtained:	Central database information
7.	Organization Name:	Texas Commission on Environmental Quality
	Web Site Address:	https://www.tceq.texas.gov/permitting/wastewater/pending-permits/tpdes-applications
	Information Obtained:	Administrative Package for TPDES permit renewal
8.	Organization Name:	US Environmental Protection Agency
	Web Site Address:	http://www.epa.gov/frs
	Information Obtained:	Database information
9.	Organization Name:	City of Corpus Christi
	Web Site Address:	https://corpus.maps.arcgis.com/apps/webappviewer/index.html?id=364701d357474326839d4099aa526473
	Information Obtained:	Utility location and easement information
10.	Organization Name:	City of Corpus Christi
	Information Obtained:	Existing Conditions Site Plan
11.	Organization Name:	City of Corpus Christi
	Contact Name:	Harry Clifford, Plant Superintendent
	Information Obtained:	Interview questionnaire

1.5. Qualifications Statement

Ms. Tara L. Ducrest, Environmental Scientist for Hanson Professional Services Inc., received a B.S. in Environmental Science with concentration in Chemistry in 2006 from Texas A&M University – Corpus Christi and an M.P.A. with an emphasis in Environmental Science in 2009 from Texas A&M University – Corpus Christi. Ms. Ducrest has performed numerous ESAs on industrial, commercial, residential, and undeveloped properties.

2. Property Description

2.1. Location

The subject property is located southwest of the intersection of Greenwood Drive and Saratoga Boulevard in Corpus Christi, Nueces County, Texas 78417. The center of the subject property lies at approximately 27.719271° north latitude and -97.457559° west longitude. The Subject Property Location Map and Subject Property Detail Map are provided as Figures 1 and 2.

2.2. Legal Description

The subject property occupies 25.8 acres on the north portion of Property ID 200098058, which has the following legal description in the Nueces County Appraisal District property details: GREENWOOD WASTEWATER PLANT SITE 62.735 ACS OUT 94.455 AC TR.

2.3. Property and Vicinity Characteristics

The elevation of the subject property is relatively flat and ranges from 20 to 32 feet above sea level, with sloping generally towards La Volla Creek to the west. Federal Emergency Management Agency (FEMA) flood data was reviewed, and it was determined that the west portion of the subject property is located in Zone AE-Floodway and the east portion is located in Zone AE—an area subject to the 1-percent annual chance (100-year) flood and Zone X (shaded)—an area subject to the 0.2-percent annual chance (500-year) flood.

The National Wetlands Inventory (NWI) identified eleven of the wastewater treatment units on the subject property as freshwater ponds. La Volla Creek to the west of the subject property was identified as a riverine wetland.

Soils of the subject property consist of Victoria clay (1 to 3 percent slopes). Drainage class for Victoria clay in this location is well drained and soils in this group have moderately high runoff potential when thoroughly wet. Water transmission through Victoria clay is somewhat restricted.

Geologic information shows that the subject property is in the Beaumont Formation, with areas predominantly clay.

Physical feature information was provided by ERIS in the Physical Setting Report, which is included in Exhibit A.

2.4. Easements and Right of Ways

RRC records identified natural gas pipelines along the north and east boundaries of the subject property. City of Corpus Christi GIS data was reviewed for utilities and easements. Wastewater mains are present in on the subject property for operation of the WWTP on-site. City of Corpus Christi natural gas lines are present along the north boundary and in the northeast portion of the subject property. A map showing the City of Corpus Christi utilities is provided in Exhibit B.

2.5. Title Review

A chain of title search was not performed for this property.

2.6. Current Uses of Subject Property

The City of Corpus Christi Greenwood Wastewater Treatment Plant is currently operating at the subject property.

2.7. Past Uses of Subject Property

The subject property has been a WWTP since 1957. Prior to 1957, the subject property appears to have been used as farmland since at least the 1930s. A home appears to have been on the subject property in the 1950s.

2.8. Current Uses of Adjacent and Surrounding Properties

The following table lists the current uses of the adjacent and surrounding properties:

Table 2-1 – Current Uses of Surrounding Properties

North	East	South	West
Saratoga Boulevard and farmland	Greenwood Drive, farmland, and Legacy Sports fields	Undeveloped land, horse stables, Voss Engineering, and VLS Texas Molecular	Undeveloped land, La Volla Creek, and Peewee’s Pet Adoption

2.9. Past Uses of Adjacent and Surrounding Properties

The following table lists the past uses of the adjacent and surrounding properties determined by review of historical aerial photographs and city directories:

Table 2-2 – Past Uses of Surrounding Properties

North	East	South	West
Saratoga Boulevard, farmland, and oil and gas exploration	Greenwood Drive, farmland, and Legacy Sports fields	Undeveloped land, oil and gas exploration, Voss Engineering, and VLS Texas Molecular	Undeveloped land, La Volla Creek, and Peewee’s Pet Adoption

3. Record Review

3.1. General

Public and private entities are required to comply with applicable federal and state environmental regulations. The primary regulations, which are pertinent to this assessment, are the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the Resource Conservation and Recovery Act (RCRA). Reasonably obtainable agency records were reviewed in order to determine facilities which might present a potential to release hazardous substances, or petroleum products, which may affect the subject property.

3.2. Database Report Summary

Information pertaining to potential environmental liabilities resulting from the treating, storing, disposing, discharging, or emitting of hazardous and/or regulated substances was obtained by Hanson Professional Services Inc., through ERIS. The minimum ASTM E1527–21 database search distances are identified in the following table.

Table 3-1 – Minimum ASTM Search Distances

Standard Environmental Record Sources	ASTM Minimum Search Distances (Miles)
Lists of Federal NPL (Superfund) Sites	1.0
Lists of Federal Delisted NPL Sites	0.5
Lists of Federal Sites Subject to CERCLA removals and CERCLA Orders	0.5
List of Federal CERCLA Sites with NFRAP	0.5
Lists of Federal RCRA Facilities Undergoing Corrective Action	1.0
Lists of Federal RCRA TSD Facilities	0.5
Lists of Federal RCRA Generators	Property and Adjoining Properties
Federal Institutional Control/Engineering Control Registries	Subject Property Only
Federal ERNS List	Subject Property Only
Lists of State/Tribal Superfund Equivalent Sites	1.0
Lists of State/Tribal Hazardous Waste Facilities	0.5
Lists of State/Tribal Landfill and Solid Waste Disposal Facilities	0.5
Lists of State/Tribal Leaking Storage Tanks	0.5
Lists of State/Tribal Registered Storage Tanks	Subject Property and Adjoining Properties
State and Tribal Institutional Control/Engineering Control Registries	Subject Property Only
Lists of State/Tribal Voluntary Cleanup Sites	0.5
Lists of State/Tribal Brownfield Sites	0.5

ERIS provided information available through the following federal, state, local, tribal, and proprietary databases.

Table 3-2 – Databases/Records Searched

Federal Listings	
Acronym	Database
NPL	National Priority List
PROPOSED NPL	National Priority List - Proposed
DELETED NPL	Deleted National Priority List
SEMS	Superfund Enterprise Management System List 8R Active Site
ODI	Inventory of Open Dumps, June 1985
SEMS ARCHIVE	SEMS List 8R Archive Sites
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
IODI	EPA Report on the Status of Open Dumps on Indian Lands
CERCLIS NFRAP	CERCLIS – No Further Remedial Action Planned
CERCLIS LIENS	CERCLIS Liens
RCRA CORRACTS	RCRA-CORRACTS-Corrective Action
RCRA TSD	RCRA non-CORRACTS TSD Facilities
RCRA LQG	RCRA Generator List
RCRA SQG	RCRA Small Quantity Generators List
RCRA VSQG	RCRA Very Small Quantity Generators List
RCRA NON GEN	RCRA Non-Generators
RCRA CONTROLS	RCRA Sites with Controls
FED ENG	Federal Engineering Controls
FED INST	Federal Institutional Controls
NPL IC	Institutional Control Boundaries at NPL sites
LUCIS	Land Use Control Information System
ERNS 1982 TO 1986	Emergency Response Notification System
ERNS 1987 TO 1989	Emergency Response Notification System
ERNS	Emergency Response Notification System
FED BROWNFIELDS	The Assessment Cleanup and Redevelopment Exchange System (ACRES) Brownfield Database
FEMA UST	Federal Emergency Management Agency (FEMA) Underground Storage Tank Listing
FRP	Facility Response Plan
DELISTED FRP	Delisted Facility Response Plans
HIST GAS STATIONS	Historical Gas Stations
REFN	Petroleum Refineries
BULK TERMINALS	Petroleum Product and Crude Oil Rail Terminals
SEMS LIEN	Lien on Property
SUPERFUND ROD	Superfund Decision Documents

State (TX) Listings	
SUPERFUND	Superfund Sites Boundaries
SHWS	State Superfund Registry
SDA	Superfund Site Discovery and Assessment Program
DELISTED SHWS	Delisted State Superfund Registry List
SWF/LF	Permitted Solid Waste Facilities
CLI	Closed Landfill Inventory
HGAC CLI	Houston-Galveston Closed Landfill Inventory
AACOG CLI	Alamo Area Council of Governments Closed Landfill Inventory
IHW	Commercial Management Facilities for Hazardous Waste and Industrial Solid Wastes
IHW RECEIVER	Industrial and Hazardous Waste-Receivers
RWS	Radioactive Waste Sites
LPST	Leaking Petroleum Storage Tank Database
DELISTED LST	Delisted Leaking Storage Tanks
UST	Underground Petroleum Storage Tanks
AST	Aboveground Storage Tanks
PST	Petroleum Storage Tanks Database
HIST TANK	Historical Tank Construction Notification
UST AUSTIN	Austin Underground Storage Tanks
PETROL CAVERN	Salt Caverns for Petroleum Storage
DTNK	Delisted Storage Tanks
AUL	Sites with Controls
VCP	Voluntary Cleanup Program
VCP RRC	Texas Railroad Commission Voluntary Cleanup Program
OP CLEANUP	Operator Cleanup Program
IOP	Innocent Owner/Operator Program
BROWNFIELDS	Brownfields Site Assessment Database
BROWN RRC	Texas Railroad Commission Brownfields
MSD	Municipal Setting Designation
Tribal Listings	
INDIAN LUST	Leaking Underground Storage Tanks on Tribal/Indian Lands
INDIAN UST	Underground Storage Tanks on Indian Land
DELISTED ILST	Delisted Tribal Leaking Storage Tanks
DELISTED IUUST	Delisted Tribal Underground Storage Tanks
County Listings	
No County standard environmental records sources available for Texas.	
Additional Environmental Records Sources	
PFAS GHG	PFAS Greenhouse Gas Emissions Data
OSC RESPONSE	On-Scene Coordinator Response Sites
PFAS NPL	PFOA/PFOS Contaminated Sites
FINDS/FRS	Facility Registry Service/Facility Index

TRIS	Toxics Release Inventory Program
PFAS FED SITES	Federal Agency Locations with Known or Suspected PFAS Detections
PFAS SSEHRI	SSEHRI PFAS Contamination Sites
PFAS ERNS	National Response Center PFAS Spills
PFAS NPDES	PFAS NPDES Discharge Monitoring
PFAS TRI	Perfluorinated Alkyl Substances (PFAS) Releases
PFAS WATER	PFAS Water Quality Portal Sampling Data
PFAS TSCA	PFAS TSCA Manufacture and Import Facilities
PFAS E-MANIFEST	PFAS Waste Transfers from RCRA e-Manifest
PFAS IND	PFAS Industry Sectors
HMIRS	Hazardous Materials Information Reporting System
NCDL	National Clandestine Drug Labs
TSCA	Toxic Substances Control Act
HIST TSCA	Historical Toxic Substances Control Act
FTTS ADMIN	Federal Insecticide, Fungicide, & Rodenticide (FIFRA) and Toxic Substances Control Act (TSCA) Administrative Case Listing
FTTS INSP	FTTS Inspection Case Listing
PRP	Potentially Responsible Parties List
SCRD DRYCLEANER	State Coalition for Remediation of Drycleaners Listing
ICIS	Integrated Compliance Information System
FED DRYCLEANERS	Drycleaner Facilities
DELISTED FED DRY	Delisted Drycleaner Facilities
FUDS	Formerly Used Defense Sites
FUDS MRS	FUDS Munitions Response Sites
FORMER NIKE	Former Military Nike Missile Sites
PIPELINE INCIDENT	Pipeline and Hazardous Materials Safety Administration (PHMSA) Pipeline Safety Flagged Incidents
MLTS	Material Licensing Tracking Systems
HIST MLTS	Historic Material Licensing Tracking System Sites
MINES	Mines Master Index File
SMCRA	Surface Mining Control and Reclamation Act Sites
MRDS	Mineral Resource Data System
LM SITES	DOE Legacy Management Sites
ALT FUELS	Alternative Fueling Stations
CONSENT DECREES	Superfunds Consent Decrees
AFS	Air Facility System
SSTS	Registered Pesticide Establishments
PCBT	Polychlorinated Biphenyl (PCB) Transformers
PCB	Polychlorinated Biphenyl Notifiers
POWER PLANTS	Power Plants
HIST RISK	Historical Business Activity Risk
PRIORITY CLEAN	Dry Cleaner Remediation Program Prioritization List
DRYCLEANERS	Registered Dry Cleaning Facilities

DELISTED DRYCLEANERS	Delisted Drycleaning Facility List
GWCC	Groundwater Contamination Cases
GWCC HIST	Historical Groundwater Contamination Cases
APAR	Affected Property Assessment Reports
SPILLS	Spills Database
IHW CORR ACTION	Industrial and Hazardous Waste Sites with Corrective Actions
PFAS	Per- and Polyfluoroalkyl Substances (PFAS)
LAND APPL	Land Application Permits
NOV	Notice of Violation
NOE	Notices of Enforcement
LIENS	Environmental Liens Listing
ORD	Court Orders & Administrative Orders
HIST RCRA NONRCRA	Inactive RCRA and Non-RCRA Facilities
RTOL	Recycle Texas Online Program
UIC	Underground Injection Control
IHW GENERATOR	Industrial and Hazardous Waste – Generators
IHW TRANSPORT	Industrial and Hazardous Waste – Transporters
AIR PERMITS	New Source Review Permits
EMISSIONS	Point Source Emissions Inventory
TIER 2	Tier 2 Report
EDWARDS AQUIFER	Edwards Aquifer Permits
Tribal	
No tribal additional environmental record sources available for Texas.	
County	
No county additional environmental record sources available for Texas.	

ERIS's regulatory database report is provided in Exhibit C.

Subject Property Findings:

Twenty database findings were reported for the subject property for ERIS IDs 1, 2, and 3. The findings were in the Notice of Violation (NOV), Notices of Enforcement (NOE), Court Orders & Administrative Orders (ORD), Facility Registry Service/Facility Index (FINDS/FRS), Integrated Compliance Information System (ICIS), Spills (SPILLS), and Tier 2 Report (TIER2) databases.

Several violations associated with the Greenwood WWTP were identified in the NOV database for the subject property. The violations ranged from November 18, 2010 to September 30, 2024 and were issued for failure to comply with the facility's Texas Pollutant Discharge Elimination System (TPDES) wastewater discharge permit. Violations included failure to meet the limit for one or more permit parameter, failure to submit a summary transmittal letter for the facility, failure to properly operate and maintain all facilities and systems of treatment and control, failure to meet fencing requirements, failure to analyze effluent samples in accordance with 40 Code of Federal Regulations (CFR) Part 136, failure to maintain records of discharge monitoring reports, failure to meet backflow prevention device requirements for public drinking water supply connections, and failure to provide potable water to the plant site.

Several violations associated with the Greenwood WWTP were identified in the NOE database for the subject property. The violations ranged from September 28, 2011 to March 31, 2022 and were issued for failure to comply with the facility's TPDES permit. Violations are either active, referred to the EPA, resolved, or withdrawn.

Active violations include the following:

- Failure to ensure that the plant and all of its systems of collection, treatment, and disposal are properly operated and maintained (sludge drying beds were overgrown, a dumpster was uncovered, the plant ran out of odor blocks to suppress odors from the headworks, the belt press was not operational, and flares for the anaerobic digesters were not operational).
- Caused, suffered, allowed or permitted emissions of hydrogen sulfide ("H₂S") from a source or sources operated on a property to exceed a net ground level concentration of 0.08 parts per million ("ppm") averaged over any 30-minute period. Specifically, TCEQ staff conducted air monitoring at the fence-line downwind from the plant and detected 0.334 ppm of H₂S averaged over a 30-minute period on August 4, 2021 and 0.180 ppm of H₂S averaged over a 30-minute period on October 19, 2021.

Violations referred to EPA include the following:

- Failure to prevent the discharge of sewage, municipal waste, recreational waste, agricultural waste, or industrial waste into or adjacent to any water in the state.

Resolved violations include the following:

- Failure to ensure that the facility is properly maintained. Specifically, during the investigation conducted on August 8, 2011, investigators noted that two support braces for an aeration basin catwalk which were corroded away. On January 9, 2012, the TCEQ Region 14 office received documentation indicating compliance with this alleged violation. Documentation included a statement that the catwalk is not necessary for the operation of the plant and has been removed as well as photographs of the area where the catwalk was removed.
- Failure to maintain H₂S net ground level concentrations at or below 0.08 ppm over an averaged 30-minute period. Specifically, the 30-minute averages of the concentration of H₂S downwind of the Greenwood Wastewater Treatment Plant's influent area were found on June 27, 2019, June 28, 2019, and July 2, 2019 to be 0.18 ppm, 0.25 ppm, and 0.11 ppm, respectively. In an email dated October 26, 2023, the City of Corpus Christi stated they had undergone a construction project. The project included removal and replacement of mechanical and manual bar screens, grit removal equipment, grit classifiers, grit pumps, valves and piping, aluminum covers, slide gates, handrails and electrical gear, conduit and wiring, rehabilitation of the concrete walls and new epoxy coating, concrete wall and beam replacement, new concrete pavement, control of flow pumping, and miscellaneous items. No recent odor complaints were received.
- Failure to prevent discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property. Documentation was received December 6, 2017 demonstrating compliance. Specifically, the Respondent completed the installation of the OMI 250 Vapor Phase Unit on December 2, 2016. In addition, a Bio Air filtration system for the Greenwood WWTF

headworks and lift station was installed on September 22, 2016. The Respondent reports that the Bio Air unit has since reduced hydrogen sulfide in both the lift station and headworks area.

- Failure to comply with testing procedures specified in 30 Texas Administrative Code (TAC) 319.4- 319.12. Specifically, operators did not have an assigned duplicate for Fecal coliform quality control. Quality assurance programs are developed to provide continual determination of accuracy and precision of the methods being used. Results of quality assurance/quality control (QA/QC) analyses are not to be used as sample results for reporting compliance. On August 19, 2011, compliance documentation was received by the TCEQ Region 14 office. The documentation was submitted by Wastewater Director Mr. Foster Crowell and included a copy of the WWTP's daily Fecal coliform analysis bench sheet, which has been updated to include a separate, predetermined column for analysis sample results and quality control duplicate results. Mr. Crowell's documentation also included a statement that operators had been trained in the new procedure on August 9, 2011.
- Failure to at all times ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. The ultraviolet (UV) disinfection system inventory was inspected during an investigation conducted on August 8, 2011. The permittee was found to have adequate spare parts for the UV disinfection system.
- Failed to properly operate and maintain the wastewater treatment plant. On July 20, 2015, the Respondent removed the debris clogging the pumps on the primary clarifier and removed the polyvinyl chloride ("PVC") pipe jamming the rake.
- Failed to annually calibrate all automatic flow measuring devices. Specifically, the flow measuring device located on the reclaim use line had not been calibrated in the previous twelve months. All automatic flow measuring or recording devices and all totalizing meters for measuring flows shall be accurately calibrated by a trained person at plant start-up and as often thereafter as necessary to ensure accuracy, but not less often than annually. Compliance documentation submitted on August 19, 2011 by Wastewater Director Mr. Foster Crowell indicated that the City had purchased a new inline flow meter to be installed on the reclaimed water line. On September 14, 2011, Wastewater Treatment Superintendent Gerald Garcia submitted a photograph of the newly installed flow meter along with a copy of the meter's certified test report.

Withdrawn violations include the following:

- Failure to prevent the discharge from any source whatsoever of one or more air contaminants or combination thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property.

The Court Orders & Administrative Orders (ORD) database found three TCEQ administrative orders and one court order for the subject property. Agreed orders found were for Docket Numbers 2007-1436-MWD-E, 2016-0638-MLM-E, and 2020-1370-AIR-E. The court order was Case Number 60750.

Pertinent findings in Agreed Order 2007-1436-MWD-E include that there was an unauthorized discharge of 10,000 gallons of wastewater discharged from the bar screen at the facility on February 15, 2006 and that the City of Corpus Christi did not comply with fecal coliform permit

limitations on June 1, 2006. Corrective measures include resetting the bar screen circuit breaker, conducting additional fecal coliform sampling to show compliance, and restoring power to the automatic ultraviolet disinfection control system. The City of Corpus Christi completed a Supplemental Environmental Project (SEP) to offset the TCEQ penalty associated with the violations. The SEP required the City to contribute the penalty amount to the Colonial Waterbird Rookery Island Enhancement Project on Causeway and Shamrock Islands in Nueces County.

Pertinent findings in Agreed Order 2016-0638-MLM-E include that the WWTP failed to prevent nuisance odor conditions and had a bar screen failure at the headworks, clogged primary clarifier pumps that prevented the transfer of sludge. Odor surveillance along Saratoga Boulevard and the Los Colonias neighborhood was conducted by TCEQ and the odor was classified as highly offensive and the intensity was assessed as strong to very strong. Handheld surveillance equipment recorded elevated levels of total reduced sulfur concentrations. The bar screen failure and clogged pump prevented the transfer of sludge and caused the sludge to become septic. Corrective measures included implementing measures to control odor nuisances at the facility. The City of Corpus Christi completed a SEP to offset the TCEQ penalty associated with the violations. The SEP required the City to install a vapor phase unit at the WWTP to help control and neutralize odors.

Pertinent findings in Agreed Order 2020-1370-AIR-E include that the City of Corpus Christi allowed emissions of hydrogen sulfide from a source to exceed a net ground level concentration of 0.08 parts per million averaged over any 30-minute period and failed to prevent nuisance odor conditions. TCEQ conducted air monitoring at the fence-line downwind from the plant and detected 0.18 ppm of hydrogen sulfide over a 30-minute period on June 27, 2019, 0.25 ppm of hydrogen sulfide over a 30-minute period on June 28, 2019, and 0.11 ppm of hydrogen sulfide over a 30-minute period on July 2, 2019. Odor surveys at off-site locations were conducted and moderate to very strong and highly offensive sulfurous sewage odors were detected. Corrective measures include completing a SEP to offset the TCEQ penalty associated with the violations. The SEP required the City to install an OMI Ecosorb unit to control nuisance gas emissions from the lift station.

For Court Order Number 60750, the United States and the State of Texas lodged a Consent Decree with the United States District Court for the Southern of Texas in a lawsuit entitled *United States and State of Texas v. City of Corpus Christ*, Civil Action NO. 2:10-cv-00235. The lawsuit aimed to eliminate illegal sanitary sewer overflows. Corrective measures required by the consent decree included cleaning and inspecting all small diameter gravity sewer mains in prioritized areas that experienced overflows, inspecting all manholes associated with large diameter gravity sewer mains, inspecting all lift stations, completing all priority projects, and completing all gravity sewer main cleaning.

According to the Facility Registry Service/Facility Index (FINDS/FRS) database, the subject property is regulated under the National Pollutant Discharge Elimination System (NPDES) for stormwater, wastewater, and pretreatment programs.

The Integrated Compliance Information System (ICIS) database showed that the subject property has an NPDES individual permit.

The Spills (SPILLS) database included a record of a spill of wastewater on April 15, 2013 at the subject property caused by a line break and a record of a sewer odor on March 4, 2013.

The Tier 2 Report (TIER2) database included information that the subject property stored up to 4,999 pounds of polyelectrolytes and up to 999 pounds of sodium hypochlorite from 2005 to 2012.

The wastewater treatment plant operations at the subject property are a REC.

Off-Site Findings:

Additionally, 15 sites were identified within the ASTM search radius beyond the subject property.

ERIS Site 4, Jam-Tex-Mex Composting Facility, which is approximately 57 feet west northwest of the subject property, was identified in the Permitted Solid Waste Facilities (SWF/LF) database. The site is listed as a resource recovery/composting facility that was not constructed with a revoked/withdrawn legal status as of February 28, 1988.

ERIS Site 5, Jam Tex Mex, which is approximately 184 feet west northwest of the subject property, was identified in the Inactive RCRA and Non-RCRA Facilities (HIST RCRA NONRCRA) database. The site is listed as an inactive regulated RCRA generator facility. The site was listed as an Industrial and Hazardous Waste receiver.

ERIS Site 6, Star Operations – Corpus Christi, located at 1622 Saratoga Boulevard, Corpus Christi, Texas 78417, which is located approximately 568 feet east of the subject property, was identified in the Notice of Violation (NOV) database. The site has violations for failing to prevent the discharge of a solid waste at an unauthorized site which may create a nuisance or endanger human health and welfare or the environment. The violations were resolved on April 3, 2003.

ERIS Site 7, located at 6346 Harwick Drive, Corpus Christi, Texas 78417, which is approximately 886 feet east northeast of the subject property, was listed under several names including: Durrill Properties, Harwick Foundations, and Harwick Foundation inc. Durrill Properties was identified in the Affected Property Assessment Reports (APAR) database as an Inactive Leaking Petroleum Storage Tank (LPST) APAR location with final concurrence issued in 2007. Durrill properties was identified in the LPST Database. Groundwater was impacted and there were no apparent threats or impacts to receptors. TCEQ has issued final concurrence, and the case was closed in 2008. Durril Properties was identified in the NOV Database with several violations including, failure to submit to the agency a notice of change, failure to have qualified personnel in accordance with the licensing requirements of 334.401(a) conducting the permanent removal of an underground storage tank, and failure to determine whether or not any prior release of a stored regulated substance has occurred from the system. All violations have been resolved by submittal of proper documentation or corrective actions. Durril Properties was identified in the Underground Petroleum Storage Tank (UST) database. Three 2,000-gallon USTs were permanently filled in place on site in 2003. Harwick Foundations was identified in the HIST RCRA NONRCRA database. The site is listed as an inactive regulated RCRA generator facility. Harwick Foundation Inc. was identified in the Historical Tank Construction Notification (HIST TANK) database. The site has one construction notification from 2003 for the removal of a UST onsite.

ERIS Site 8, AAA Auto Parts, located at 1706 Saratoga Boulevard, Corpus Christi, Texas 78417, which is located approximately 944 feet east of the subject property, was identified in the NOV database. The site has 10 violations, all of which have been resolved via submission of compliance documentation and or updates to records.

ERIS Site 9, Core Environmental and Spill Response, located at 6342 Harwick Drive, Corpus Christi, Texas 78417, which is located approximately 987 feet east-northeast of the subject property, was identified in the Industrial and Hazardous Waste-Receivers (IHW RECEIVER) and RCRA Non-Generators (RCRA NON GEN) databases. The site is listed as a transfer facility and transporter for industrial and hazardous waste. This facility has not been identified as a Recycler Facility from both the RCRA Handler and Biennial Report Modules and as of April 2025, there are no Compliance Monitoring and Enforcement (violation) records associated with this facility.

ERIS Site 10, Lower Coast Perforators, located at 6318 Harwick Drive, Corpus Christi, Texas 78417, which is located approximately 1,238 feet east northeast of the subject property, was identified in the HIST RCRA NONRCRA database as an inactive regulated RCRA generator facility.

ERIS Site 11, which is located approximately 1,462 feet south-southwest of the subject property, was listed under several names including: Chemical Waste Management Inc., Texas Molecular Corpus Christi Services, Chemical Waste Management, and TM Corpus Christi Services. This site was identified in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), CERCLIS - No Further Remedial Action Planned (CERCLIS NFRAP), Industrial and Hazardous Waste Sites with Corrective Actions (IHW CORR ACTION), IHW RECEIVER, Polychlorinated Biphenyl Notifiers (PCB), RCRA Sites with Controls (RCRA CONTROLS), RCRA-CORRACTS-Corrective Action (RCRA CORRACTS), RCRA non-CORRACTS TSD Facilities (RCRA TSD), Superfund Site Discovery and Assessment Program (SDA), SEMS List 8R Archive Sites (SEMS ARCHIVE), and SWF/LF databases.

The CERCLIS, CERCLIS NFRAP, and SEMS ARCHIVE database findings included that the site did not qualify for the National Priorities List (NPL) and that no further activity is planned at the site as of June 1, 1980.

The IHW CORR ACTION database findings show the site as active, with an ongoing workload as of March 27, 2006.

The IHW RECIEVER database findings show that the site received wastes, including hazardous filter press cake, wastewater, non-hazardous tank bottoms, groundwater from a French drain, spent scrubber water/solution, waste organics, liquid waste from filter pot, plant trash, contaminated personal protective equipment, plant debris (non-hazardous), Mikrodur R95 cement, non-hazardous polymer, small PCB-containing capacitors, contaminated soil from well drilling operations, soil contaminated with organics, spent acid from cleaning, unused hydrated lime, non-hazardous wastewater, solids from decontamination activities, hazardous tank bottoms, non-hazardous blasting media, sanitary sewage wastewater, contaminated plant debris, lab trash/glassware/wipes, laboratory wastes, organic liquids, vermiculite saturated with Di-tertiary butyl peroxide, stormwater collected in secondary containment areas, caustic soda with sulfuric acid, tank bottom filter cake sludge, non-hazardous absorbents and filters, lab-pack of samples/outdated chemicals, soil contaminated with sodium hydroxide, non-contaminated

pursuant protective equipment, strainer solids, non-hazardous contaminated soil from cleanup, PCB contaminated solids from laboratory analysis, spent activated carbon, non-hazardous oil, super critical water oxidation process water, construction debris from onsite building, stormwater runoff, contaminated equipment, groundwater, and cartridge/bag filters/strainer solids.

The PCB database findings stated that the facility is a generator of PCBs.

The RCRA CONTROLS, RCRA CORRACTS, and RCRA TSD database findings identify the facility as a large quantity generator with recycler activity and a large quantity generator with no recycler activity. The site had violations associated with general facility standards and underground injection in 1988, 1993, and 2004. Numerous hazardous wastes handled at the facility are listed in the database report.

The SDA database findings show that the site is listed as an inactive site with a project status of inactive since 1996.

The SWF/LF database findings state that the facility is a miscellaneous solid waste processing facility. The site is listed as being active as of August 31, 2014.

ERIS Site 12, Texas Molecular Corpus Christi Services, which is located approximately 1,741 feet southwest of the subject property, was identified in the PFAS Industry Sectors (PFAS IND) database. This site is listed as an active site holding LQG, Legacy TSDF, and operating TSDF RCRA permits. No violations have been identified.

ERIS Site 13, Southwest Land and Marine Greenwood Facility, located at 7300 Greenwood Drive, Corpus Christi, Texas 78415, which is located approximately 2,163 feet south southwest of the subject property, was identified in the HIST RCRA NONRCRA database. The site is listed as an inactive regulated RCRA generator facility.

ERIS Site 14, Casey Glass, located at 1954 Saratoga Boulevard, Corpus Christi, Texas 78417, which is located approximately 2,473 feet east-southeast of the subject property, was identified in the LPST database. The site is listed as having final concurrence issued with soil contamination only. A full site assessment RAP was required.

ERIS Site 15, Southwest Oil Recycling Corpus Christi, located at 7330 Greenwood Drive, Corpus Christi, Texas 78415, which is located approximately 2,962 feet south-southwest of the subject property, was identified in the IHW CORR ACTION database. The site is identified as being active and in the ongoing workload phase as of 2025.

ERIS Site 16, SDC Services, located at 7500 Greenwood Drive, Corpus Christi, Texas 78415, which is located approximately 3,043 feet south-southwest of the subject property, was identified in the SDA database. The site is listed as an inactive site with a project status of inactive since 2000.

ERIS Site 17, Corpus Christi Army Depot Saratoga Road, located at 2022 Saratoga Boulevard, Corpus Christi, Texas 78417, which is located approximately 3,056 feet east-southeast of the subject property,

was identified in the SDA database. The site is listed as an inactive site with a project status of inactive since 1996.

ERIS Site 18, SDS Services Inc., which is located at 7500 Greenwood, Corpus Christi, Texas 78415, which is located approximately 3,164 feet south-southwest of the subject property, was identified in the RCRA CORRACTS database. This facility has not been identified as a Recycler Facility from both the RCRA Handler and Biennial Report Modules. All of the compliance records associated with this facility indicate No Violations; Compliance Monitoring and Enforcement table dated April 2025.

Based on the information available in the database report and the proximity and physical setting of the off-site identified sites, the sites are not considered to be recognized environmental conditions (RECs).

3.3. Historical Aerial Photographs

Sets of readily available historical aerial photographs of the subject property from ERIS can be found in Exhibit D. The aerial photograph coverage illustrates how the subject property and surrounding properties have evolved.

3.3.1. Aerial Photograph – 1938 (1" = 500'±)

In this aerial photo from 1938, the subject property and surrounding land appears to be farmland. Roads can be seen to the north and east of the subject property. La Volla Creek can be seen along the west subject property boundary. Approximately 400 feet north of the subject property, a disturbed area that coincides with the known location of a dry hole oil/gas well can be seen.

3.3.2. Aerial Photograph – 1950 (1" = 500'±)

In this aerial photo from 1950, there appears to be a homestead site on the northeast portion of the subject property. Most surrounding land still appears to be farmland.

3.3.3. Aerial Photograph – 1956 (1" = 500'±)

In this aerial photo from 1956, the homestead site on the subject property can still be seen. La Volla Creek is still present along the west subject property boundary. Approximately 1,350 feet southwest of the subject property, there appears to be two ponds or waste disposal pits. An additional pond/pit can be seen approximately 2,400 feet southwest of the subject property.

3.3.4. Aerial Photograph – 1961 (1" = 500'±)

In this aerial photo from 1961, treatment units for the wastewater treatment plant can be seen on the north portion of the subject property. The ponds/waste disposal pits to the south can still be seen. Approximately 850 feet southeast of the subject property, a disturbed area and pit that coincide with the known location of a dry hole oil/gas well can be seen.

3.3.5. Aerial Photograph – 1968 (1" = 500'±)

In this aerial photo from 1968, two treatment units on the west side of the WWTP have been removed from the subject property. Most surrounding land is still farmland. To the west, La Volla Creek appears to have been excavated. Approximately 900 feet east of the subject property, commercial development appears to be present north of Saratoga Boulevard.

3.3.6. Aerial Photograph – 1974 (1" = 500'±)

In this aerial photo from 1974, two new treatment units have replaced the units that were previously removed from the west side of the subject property. Most surrounding land still appears to be farmland. There appears to be an industrial facility with several aboveground storage tanks to the east of the ponds/waste disposal pits located south of the subject property. Additional ponds/waste disposal pits can also be seen at the site.

3.3.7. Aerial Photograph – 1979 (1" = 500'±)

In this aerial photo from 1979, a new treatment unit can be seen on the northwest portion of the subject property. To the west, additional commercial development has occurred north of Saratoga Boulevard. Across La Volla Creek to the west, a pond and new development can be seen.

3.3.8. Aerial Photograph – 1983 (1" = 500'±)

In this aerial photo from 1983, there appear to be two excavated areas on the south portion of the subject property. To the south, only one of the ponds/waste disposal pits is still visible. The aboveground storage tanks are still visible. To the northeast, additional commercial development has occurred north of Saratoga Boulevard.

3.3.9. Aerial Photograph – 1985 (1" = 500'±)

In this aerial photo from 1985, the subject property appears similar to the previous photo. To the south, the one remaining pond/waste disposal pit can no longer be seen. The aboveground storage tanks are still visible. To the northeast, additional commercial development has occurred north of Saratoga Boulevard. To the east of the subject property, sports fields can be seen.

3.3.10. Aerial Photograph – 1995 (1" = 500'±)

In this aerial photo from 1995, two additional clarifiers, sludge drying beds, and a supernatant lagoon are visible. Across La Volla Creek to the west and northwest, residential development appears to have occurred.

3.3.11. Aerial Photograph – 2002 (1" = 500'±)

In this aerial photo from 2002, treatment units have been removed from west side of the north portion of the subject property and treatment units have been added to the east side of the north portion of the subject property. Surrounding properties appear similar to the previous photo.

3.3.12. Aerial Photograph – 2004 (1" = 500'±)

In this aerial photo from 2004, the subject property and surrounding properties appear similar to the previous photo.

3.3.13. Aerial Photograph – 2005 (1" = 500'±)

In this aerial photo from 2005, the subject property and surrounding properties appear similar to the previous photo.

3.3.14. Aerial Photograph – 2006 (1" = 500'±)

In this aerial photo from 2006, the subject property and most surrounding properties appear similar to the previous photo. Across La Volla Creek to the west, several small buildings associated with Peewee's Pet Adoption World & Sanctuary can be seen.

3.3.15. Aerial Photograph – 2008 (1" = 500'±)

In this aerial photo from 2008, the subject property and surrounding properties appear similar to the previous photo.

3.3.16. Aerial Photograph – 2010 (1" = 500'±)

In this aerial photo from 2010, the subject property and most surrounding properties appear similar to the previous photo. To the south, across Greenwood Drive, a commercial business can be seen.

3.3.17. Aerial Photograph – 2012 (1" = 500'±)

In this aerial photo from 2012, the subject property and surrounding properties appear similar to the previous photo.

3.3.18. Aerial Photograph – 2014 (1" = 500'±)

In this aerial photo from 2014 the subject property and surrounding properties appear similar to the previous photo.

3.3.19. Aerial Photograph – 2016 (1" = 500'±)

In this aerial photo from 2016, the subject property and surrounding properties appear similar to the previous photo.

3.3.20. Aerial Photograph – 2018 (1" = 500'±)

In this aerial photo from 2018, the subject property appears similar to the previous photo. Across La Volla Creek to the west, clearing of land can be seen. To the south, a horse stable can be seen near the commercial building.

3.3.21. Aerial Photograph – 2020 (1" = 500'±)

In this aerial photo from 2020, the subject property and surrounding properties appear similar to the previous photo.

3.3.22. Aerial Photograph – 2022 (1" = 500'±)

In this aerial photo from 2022, the subject property and surrounding properties appear similar to the previous photo.

3.3.23. Aerial Photograph – 2025 (1" = 500'±)

In this aerial photo from 2025, the subject property is still being used as a wastewater treatment plant. To the north, Saratoga Boulevard and farmland can be seen. To the east, Greenwood Drive, farmland, and a sports field can be seen. To the south, undeveloped land, a horse stable, commercial properties, and an industrial site with aboveground storage tanks can be seen. To the west, La Volla Creek, undeveloped land, and Peewee's Pet Adoption World & Sanctuary can be seen.

3.4. Historical Topographic Maps

Historical topographic maps provide information on the topography of the subject property and surrounding properties and may contain information on oil and gas exploration and waste disposal. The maps did not show signs of oil and gas exploration or waste disposal on the subject property. The 1951 maps show the homestead site that was located on the northeast portion of the subject property. The 1968, 1975, 2016, 2019, and 2023 maps show several wastewater treatment units on the subject property. The 1975 map shows oil sumps or sludge pits on the industrial property approximately 1,350 feet south of the subject property. The historical topographic maps are provided in Exhibit E.

3.5. City Directories

City Directory services were requested from ERIS for this report; the City Directory Report is provided in Exhibit F. No listings were identified for the subject property.

Listings for the industrial property approximately 1,350 feet south of the subject at 6901 Greenwood include: Chemical Waste Management Inc. in 1980, 1985, 1990, and 1995 and International Pollution Control in 1975.

Listings for the industrial property approximately 2,500 feet south of the subject at 7330 Greenwood include: Afo Inc., National Oil Recovery Inc., National Trailer Co, SDC Services, SW Crude Inc., SW Environmental Services, SW Oil Recovery Inc., SW Oil Recycling in 1995 and Alamo Fuel Oil Inc, Rio Drilling Co, SDC Services Inc, and Texas Crude Market in 1990.

Listings for the property to the east of the subject property across Greenwood Drive at 1545 Saratoga Boulevard include: S 3 TX Sports and Salinas Baseball Academy in 2024; Salinas Baseball Academy in 2020

and 2023; Champion Park, S 3 TX Sports, and Salinas Baseball Academy in 2016, and Grandstands Inc in 1990, 1995, and 2000.

3.6. Fire Insurance Map Records

Historical fire insurance maps were requested from ERIS to evaluate the past uses and relevant characteristics of the subject property and surrounding properties. No maps were available for the subject property or surrounding properties. The Fire Insurance Map Report is supplied in Exhibit G.

3.7. Environmental Liens

The environmental lien search was performed by ERIS for the subject property; the results are provided in Exhibit H. According to the environmental lien search, no environmental liens or activity and use limitations were found. Eleven miscellaneous documents were provided in the environmental lien search report and are summarized below:

Decision of the Executive Director

This document does not reference the subject property. This document refers to the TCEQ's response to comments for permitting of a wastewater permit by Greenwood Ventures Group LLC and is located in Lockhart County.

Riparian Evaluation of Oso Creek and Tributaries

This report evaluates Oso Creek and was prepared to support the Total Maximum Daily Load Implementation Plan for Oso Creek. La Volla Creek, which is adjacent to the west subject property boundary, is Segment 6 of Oso Creek in the report. The report states that Segment 6 receives effluent from the Greenwood WWTP.

ECHO Detailed Facility Report

The ECHO Detailed Facility Report for the Greenwood Plant at 6541 Greenwood Drive, Corpus Christi, Texas states that a violation was identified between April 2025 and August 2025 for wastewater permit exceedances for Enterococci results and significant non-compliance occurred between July 2024 and September 2024 for ammonia nitrogen exceedances. The report also shows that sanitary sewer overflows occurred from the wastewater collection system in 2022, 2023, and 2024.

Two Effluent Charts

Effluent charts were available for the Greenwood WWTP from April 2022 to August 2025. The charts indicate that effluent limitation violations occurred during the timeframe.

Two Civil Enforcement Case Reports (Case Numbers TX-2016-0638-MLM-E and 06-2011-1897)

Case/Docket Number 2016-0638-MLM-E is summarized in the database findings in Section 3.2.

The civil enforcement case report for Case Number 06-2011-1897 states that a consent decree or court order resolving a civil judicial action was entered January 11, 2021 and enforcement action has not closed. A penalty of \$568,000 was assessed for this case. Compliance actions taken include paying the required penalty amount, submitting event reports, annual reports, and workplans. Final compliance with the obligations of the order are anticipated to be achieved in 2036.

Executive Summary-Enforcement Matter-Case No. 52223 (Docket Number 2016-0638-MLM-E)

This case is summarized in the database findings in Section 3.2.

Executive Summary-Enforcement Matter-Case No. 59977 (Docket Number 2020-1370-AIR-E)

This case is summarized in the database findings in Section 3.2.

Wastewater Treatment Plant Asset Evaluation

This evaluation was completed for existing wastewater treatment plants in Corpus Christi, including the Allison, Broadway, Greenwood, Laguna Madre, Oso, and Whitecap WWTPs. Information pertaining to the Greenwood WWTP includes that the plant is anticipated to exceed the 75% flow threshold to require engineering and financial planning for expansion and/or upgrading of the WWTP within ten years of the report date (2023). As of 2023, the Greenwood WWTP had a capacity of 8 million gallons per day (MGD). The plant was constructed in 1957 as a trickling filter plant with anaerobic digestion. Two expansions in the 1980s increased the capacity to 8 MGD and converted the plant to a conventional activated sludge process with lift station, screening, grit removal, aeration basins, final clarifiers, solids pump station, tertiary filter, UV disinfection, anaerobic digester, dissolved air floatation (DAF) thickener, and a belt filter press. The plant was rated as “poor” in 2016 and the headworks of the plant was rehabilitated in 2018 with new screens and grit removal system. A new tertiary cloth filter and UV disinfection facility were also completed. The capacity of the WWTP is planned to be expanded to 12 MGD to address future development in the area. The expansion would include additional aeration basins, an additional final clarifier, new turbo blowers with fine bubble diffusers and automatic controls on air supply, and new RAS and WAS pump stations. The existing DAF and two anaerobic digesters will be converted to aerated sludge holding tanks. A dewatering feed pump facility will be constructed to pump dewatered solids to the existing belt filter presses. Recent flooding was stated to have damaged the plant and future improvements should include raising containment walls or berms around key components and on-site drainage improvements.

Water Quality and Biological Characterization of Oso Creek & Oso Bay, Corpus Christi, Texas

This report from 2001 characterized Oso Creek and Oso Bay. The report stated that effluent from the Greenwood WWTP eventually enters Oso Creek.

Administrative Package (MS4 Permit Renewal)

The administrative package provides information on the renewal of the City of Corpus Christi Small Municipal Separate Storm Sewer System (MS4) permit. Information pertaining to the Greenwood WWTP is that the WWTP has water quality permits, including a 210 Reuse Authorization, a Multi-Sector General

permit for stormwater discharges, and a wastewater discharge permit. The Stormwater Management Program prepared with the permit renewal states that the Greenwood WWTP receives collected stormwater from the nearby J.C. Elliot Transfer Station. The WWTP also receives leachate and condensate periodically from the J.C. Elliot Landfill, which closed to receiving waste on February 11, 2010.

NETROnline Environmental Radius Report

The radius report identified two RCRA Treatment Storage Disposal Facilities within 0.5 miles of the subject property and four Emergency Response Notification System (ERNS) sites within 0.25 miles of the subject property. The RCRA and ERNS sites identified were at Texas Molecular.

3.8. Oil and Gas Exploration and Water Well Records

Oil, gas, and water well records from ERIS were reviewed for the subject property and surrounding land. No wells were identified on the subject property. Well locations identified within one mile of the subject property include two permitted locations, 21 dry hole locations, one plugged gas well, one gas well, one oil well, 33 monitor wells, 38 plugged monitor wells, four environmental soil borings, three plugged environmental soil borings, three injection wells, one stock well, one irrigation well, four water wells, and one unknown purpose well. The nearest well identified was a permitted location for a cathodic well approximately 263 feet north of the subject property. One natural gas pipeline was identified along the north boundary of the subject property. Across Saratoga Boulevard, a natural gas pipeline, an abandoned crude oil pipeline, and an abandoned highly volatile liquid pipeline parallel the roadway. Across Greenwood Drive, a natural gas pipeline parallels the roadway. In addition, a residential gas pipeline parallels the north subject property boundary and a natural gas pipeline is present in the northeast portion of the subject property.

Railroad Commission of Texas (RRC) H-8 loss reports were reviewed, and no loss incidents were reported for the pipelines on or near the subject property from 2009 to 2025.

Well and pipeline information can be found in ERIS's Physical Setting Report in Exhibit A.

3.9. Additional Records

An Administrative Package submitted to TCEQ to renew the Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0010401003 for the Greenwood Wastewater Treatment Facility was available for review. The renewal package included information stating that the facility has a stormwater permit (No. TXR05DM76) and a reclaimed water authorization (No. R10401003).

Drawings were provided by the City of Corpus Christi for the Greenwood Wastewater Treatment Plant Dissolved Air Flotation Unit Rehabilitation & Odor Control project. The drawings were reviewed and the Existing Conditions Site Plan is provided in Exhibit I.

4. Property Reconnaissance

4.1. General

Ms. Tara Ducrest, an environmental scientist with Hanson Professional Services Inc., conducted the property reconnaissance visit of the subject property on September 16, 2025. Photographs taken during the property visit are provided in Exhibit J.

4.2. Observations

Currently, the subject property is occupied by the City of Corpus Christi Greenwood WWTP. Several wastewater treatment units are present on the subject property, including a lift station, influent structure, primary clarifiers, aeration basins, final clarifiers, effluent filters, ultraviolet disinfection basins, an effluent structure, a dissolved air flotation thickening unit, primary anaerobic digesters, a secondary anaerobic digester, a sludge dewatering facility, and sludge drying beds. An office for the WWTP is present on the east side of the subject property and an old office building is present on the north side of the subject property. Two emergency generators are present, one is near the blower building in the southeast portion of the WWTP and one is near the control room in the northwest portion of the WWTP. The out of use sludge drying beds and an out of use supernatant lagoon are fenced off on the south portion of the subject property. The sludge drying beds were overgrown with vegetation and some of the beds appeared to have piles of dried sludge present. Two pad-mounted transformers were observed between the sludge drying beds and the blower room. Two portable buildings and a storage container are present in the southwest portion of the WWTP. A storage area for trailers, portable diesel power systems, fuel storage containers, and spare pumps was observed in the north-central portion of the WWTP. Buckets of hydraulic oil and syn lube were observed in a storage room on the east end of the influent structure. A workshop and storage area were present inside the maintenance building. A fenced off area with utility boxes for underground AT&T cables and a residential gas meter was observed in the northeast portion of the subject property. Drums of Micro-Solve Grease and Odor Control were present on pallets outside of the maintenance building. Dumpsters for sludge storage were observed in the sludge dewatering building. Containers of Clarifloc CE-454 were observed near the sludge dewatering building. Electric distribution lines are present along the north, east, and west sides of the subject property and crossing the south portion of the subject property.

Saratoga Boulevard and farmland are present to the north of the subject property. To the east, Greenwood Drive, farmland, and Legacy Sports fields are present. Undeveloped land, horse stables, Voss Engineering, and VLS Texas Molecular are present to the south of the subject property. To the west, undeveloped land, La Volla Creek, and Peewee’s Pet Adoption are present.

4.3. Improvements

An office building and wastewater treatment units are present on the subject property, including a lift station, influent structure, primary clarifiers, aeration basins, final clarifiers, effluent filters, ultraviolet disinfection basins, an effluent structure, a dissolved air flotation thickening unit, primary anaerobic digesters, a secondary anaerobic digester, a sludge dewatering facility, and sludge drying beds. A fence surrounds the subject property.

4.4. Pits, Ponds, and Lagoons

In addition to the concrete treatment units, an earthen pond that was previously used for supernatant storage is present on the southwest portion of the subject property.

4.5. Stained Soils

No stained soils were observed on the subject property during the site visit.

4.6. Stressed Vegetation

No signs of stressed vegetation were observed on the subject property during the site visit.

4.7. Possible Presence of Polychlorinated Biphenyls (PCBs)

Two pad mounted transformers were observed north of the sludge drying beds in the southeast portion of the subject property. No markings were observed to indicate that the units are PCB-free.

Treatment units for processing sewage sludge are present on the subject property and PCBs may accumulate in sewage sludge.

4.8. Solid Waste Disposal

No signs of solid waste disposal were observed on the subject property during the site visit.

4.9. Identification of Contaminant Migration Paths

The most likely migration paths for the subject property would be via soil or groundwater infiltration or from buried piping on the subject property.

4.10. Wastewater

The subject property is a wastewater treatment plant.

4.11. Other Issues

Wastewater treatment and sludge management have occurred at the WWTP on the subject property. Sewage sludge could potentially contain Per- and Polyfluoroalkyl Substances (PFAS).

5. Interviews

Mr. Harry Clifford, the Plant Superintendent, completed an interview questionnaire regarding the Greenwood Wastewater Treatment Plant. He stated that historic uses of the subject property include use of the property as a wastewater treatment plant. He stated that chemicals used at the WWTP include paint and round up. Anaerobic sludge odors from the WWTP have occurred at the subject property. Mr. Clifford stated that waste generated onsite is disposed of at a landfill and waste from the collection system has been disposed of in the sludge drying beds. A pond is present on the subject property (out of use supernatant lagoon). No chemicals have been spilled on the subject property, no oil or gas exploration has occurred on the subject property, the subject property is not a concentrated animal feeding operation or a silviculture facility, and the subject property has not been used for hunting or shooting. Mr. Clifford's questionnaire response is provided in Exhibit K

6. Conclusion

Hanson Professional Services Inc. (Hanson) conducted a Phase I Environmental Site Assessment (ESA) for the City of Corpus Christi Greenwood Wastewater Treatment Plant (WWTP) located at 6541 Greenwood Drive in Corpus Christi, Nueces County, Texas. The ESA was performed in general accordance with the requirements for the American Society for Testing Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, Designation E1527-21.

The subject property is located southwest of the intersection of Greenwood Drive and Saratoga Boulevard in Corpus Christi, Nueces County, Texas 78417. Currently, the subject property is occupied by the City of Corpus Christi Greenwood WWTP. Several wastewater treatment units are present on the subject property, including a lift station, influent structure, primary clarifiers, aeration basins, final clarifiers, effluent filters, ultraviolet disinfection basins, an effluent structure, a dissolved air flotation thickening unit, primary anaerobic digesters, a secondary anaerobic digester, a sludge dewatering facility, and sludge drying beds. An office for the WWTP is present on the east side of the subject property and an old office building is present on the north side of the subject property. Two emergency generators are present, one is near the blower building in the southeast portion of the WWTP and one is near the control room in the northwest portion of the WWTP. The out of use sludge drying beds and an out of use supernatant lagoon are fenced off on the south portion of the subject property. The sludge drying beds were overgrown with vegetation and some of the beds appeared to have piles of dried sludge present. Two pad-mounted transformers were observed between the sludge drying beds and the blower room. No markings were observed to indicate that the units did not contain Polychlorinated Biphenyls (PCBs). Two portable buildings and a storage container are present in the southwest portion of the WWTP. A storage area for trailers, portable diesel power systems, fuel storage containers, and spare pumps was observed in the north-central portion of the WWTP. Buckets of hydraulic oil and syn lube were observed in a storage room on the east end of the influent structure. A workshop and storage area were present inside the maintenance building. A fenced off area with utility boxes for underground AT&T cables and a residential gas meter was observed in the northeast portion of the subject property. Drums of Micro-Solve Grease and Odor Control were present on pallets outside of the maintenance building. Dumpsters for sludge storage were observed in the sludge dewatering building. Containers of Clarifloc CE-454 were observed near the sludge dewatering building. Electric distribution lines are present along the north, east, and west sides of the subject property and crossing the south portion of the subject property.

The WWTP on the subject property has been in operation since 1957. Prior to 1957, the subject property appears to have been used as farmland since at least the 1930s. A home appears to have been on the subject property in the 1950s.

Saratoga Boulevard and farmland are present to the north of the subject property. To the east, Greenwood Drive, farmland, and Legacy Sports fields are present. Undeveloped land, horse stables, Voss Engineering, and VLS Texas Molecular are present to the south of the subject property. To the west, undeveloped land, La Volla Creek, and Peewee's Pet Adoption are present.

Information pertaining to potential environmental liabilities resulting from the treating, storing, disposing, discharging, or emitting of hazardous and/or regulated substances was obtained by Hanson through ERIS. Twenty database findings were reported for the subject property for ERIS IDs 1, 2, and 3. The findings were in the Notice of Violation (NOV), Notices of Enforcement (NOE), Court Orders & Administrative Orders (ORD), Facility Registry Service/Facility Index (FINDS/FRS), Integrated Compliance Information System

(ICIS), Spills (SPILLS), and Tier 2 Report (TIER2) databases. The wastewater treatment plant operations at the subject property are a recognized environmental condition (REC).

ERIS identified 15 sites within the ASTM search radius beyond the subject property boundary. Based on the available database information and the proximity and physical setting of the identified sites, they are not considered to be RECs.

Oil, gas, and water well records from ERIS were reviewed for the subject property and surrounding land. No wells were identified on the subject property. Sixty-one well locations were identified within one mile of the subject property. The nearest well identified was a permitted location for a cathodic well approximately 263 feet north of the subject property. One natural gas pipeline operated by South Shore Pipeline L.P. and a City of Corpus Christi residential gas pipeline were identified along the north boundary of the subject property. A residential gas pipeline was also identified in the northeast portion of the subject property. Railroad Commission of Texas (RRC) H-8 loss reports were reviewed, and no loss incidents were reported for the pipelines on or near the subject property from 2009 to 2025.

No stained soil or stressed vegetation were observed on the subject property during the site visit. Other than the treatment units associated with operation of the Greenwood WWTP, no waste disposal pits, ponds, or lagoons were observed on the subject property during the site visit.

Findings

Our review of site information and a property inspection revealed the following potential environmental liabilities associated with the subject property:

On-Site RECs:

- *Possible Presence of Contamination from Operation of WWTP on Subject Property* – The WWTP on the subject property has been in operation since 1957. Wastewater treatment and sludge management have occurred at the WWTP. This site could potentially be a REC due to the possible presence of contamination from metals, PCBs, and Per- and Polyfluoroalkyl Substances (PFAS). In addition, violations have occurred at the WWTP, including failure to properly operate and maintain all facilities and systems of treatment and control, failure to ensure that the plant and all of its systems of collection, treatment, and disposal are properly operated and maintained, and failure to prevent the discharge of sewage into or adjacent to any water in the state. An unauthorized discharge of 10,000 gallons of wastewater occurred at the bar screen on February 15, 2006.

Recommendations

Due to the site being an active wastewater treatment plant, a Phase II Environmental Site Assessment is not currently recommended. In the event that the Greenwood WWTP were to be decommissioned, assessment for potential contamination of the subject property would be recommended.

**Attachment G –
IPAC Documentation**

USFWS Official Species List



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Texas Coastal & Central Plains Esfo
17629 El Camino Real, Suite 211
Houston, TX 77058-3051
Phone: (281) 286-8282 Fax: (281) 488-5882

In Reply Refer To:

11/04/2025 17:54:22 UTC

Project Code: 2026-0011988

Project Name: Greenwood WWTP Flood Mitigation & Backup Generator

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The U.S. Fish and Wildlife Service (Service) field offices in Clear Lake, Corpus Christi, Fort Worth, and Alamo, Texas, have combined administratively to form the Texas Coastal & Central Plains Field Office. All project related correspondence should be sent to the field office address listed below responsible for the county in which your project occurs:

Project Leader; U.S. Fish and Wildlife Service; 17629 El Camino Real Ste. 211; Houston, Texas 77058

Angelina, Austin, Brazoria, Brazos, Chambers, Colorado, Fayette, Fort Bend, Freestone, Galveston, Grimes, Hardin, Harris, Houston, Jasper, Jefferson, Leon, Liberty, Limestone, Madison, Matagorda, Montgomery, Newton, Orange, Polk, Robertson, Sabine, San Augustine, San Jacinto, Trinity, Tyler, Walker, Waller, and Wharton.

Assistant Field Supervisor, U.S. Fish and Wildlife Service; 4444 Corona Drive, Ste 215; Corpus Christi, Texas 78411

Aransas, Atascosa, Bee, Brooks, Calhoun, De Witt, Dimmit, Duval, Frio, Goliad, Gonzales, Jackson, Jim Hogg, Jim Wells, Karnes, Kenedy, Kleberg, La Salle, Lavaca, Live Oak, Maverick, McMullen, Nueces, Refugio, San Patricio, Victoria, and Wilson.

U.S. Fish and Wildlife Service; Santa Ana National Wildlife Refuge; Attn: Texas Ecological Services Sub-Office; 3325 Green Jay Road, Alamo, Texas 78516

Cameron, Hidalgo, Starr, Webb, Willacy, and Zapata.

For questions or coordination for projects occurring in counties not listed above, please contact arles@fws.gov.

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your

proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at: <http://www.fws.gov/media/endangered-species-consultation-handbook>.

Non-Federal entities may consult under Sections 9 and 10 of the Act. Section 9 and Federal regulations prohibit the take of endangered and threatened species, respectively, without special exemption. "Take" is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct. "Harm" is further defined (50 CFR § 17.3) to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. "Harass" is defined (50 CFR § 17.3) as intentional or negligent actions that create the likelihood of

injury to listed species to such an extent as to significantly disrupt normal behavior patterns which include, but are not limited to, breeding, feeding or sheltering. Should the proposed project have the potential to take listed species, the Service recommends that the applicant develop a Habitat Conservation Plan and obtain a section 10(a)(1)(B) permit. The Habitat Conservation Planning Handbook is available at: <https://www.fws.gov/library/collections/habitat-conservation-planning-handbook>.

Migratory Birds:

In addition to responsibilities to protect threatened and endangered species under the Act, there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts visit: <https://www.fws.gov/program/migratory-birds>.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable National Environmental Policy Act (NEPA) documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Texas Coastal & Central Plains Esfo

17629 El Camino Real, Suite 211

Houston, TX 77058-3051

(281) 286-8282

PROJECT SUMMARY

Project Code: 2026-0011988

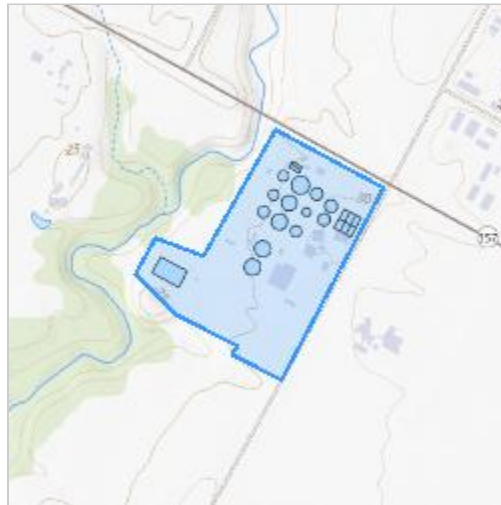
Project Name: Greenwood WWTP Flood Mitigation & Backup Generator

Project Type: Wastewater Facility - Maintenance / Modification

Project Description: The project is at the Greenwood Wastewater Treatment Plant (WWTP), which is located at 6541 Greenwood Drive to the southwest of the intersection of Greenwood Drive and Saratoga Boulevard in Corpus Christi, Nueces County, Texas 78417. The WWTP is at 27.719271° north latitude and -97.457559° west longitude. The purpose of this project is to install emergency generators and mitigate potential flood damages to the Greenwood WWTP and allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. Under this project, measures are proposed to protect those structures that are most susceptible to flooding inside the plant along with interior drainage system improvements and grading improvements to collect stormwater from the critical areas within the plant that are prone to ponding in and around plant facilities.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@27.719337850000002,-97.45756832703054,14z>



Counties: Nueces County, Texas

ENDANGERED SPECIES ACT SPECIES

There is a total of 12 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

BIRDS

NAME	STATUS
Eastern Black Rail <i>Laterallus jamaicensis ssp. jamaicensis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10477	Threatened
Northern Aplomado Falcon <i>Falco femoralis septentrionalis</i> Population: Wherever found, except where listed as an experimental population No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1923	Endangered
Piping Plover <i>Charadrius melodus</i> Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened
Rufa Red Knot <i>Calidris canutus rufa</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1864	Threatened
Whooping Crane <i>Grus americana</i> Population: Wherever found, except where listed as an experimental population There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/758	Endangered

REPTILES

NAME	STATUS
Green Sea Turtle <i>Chelonia mydas</i> Population: North Atlantic DPS There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6199	Threatened
Hawksbill Sea Turtle <i>Eretmochelys imbricata</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3656	Endangered
Kemp's Ridley Sea Turtle <i>Lepidochelys kempii</i> There is proposed critical habitat for this species. Species profile: https://ecos.fws.gov/ecp/species/5523	Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

FLOWERING PLANTS

NAME	STATUS
Slender Rush-pea <i>Hoffmannseggia tenella</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5298	Endangered
South Texas Ambrosia <i>Ambrosia cheiranthifolia</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/3331	Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act ² and the Migratory Bird Treaty Act (MBTA) ¹. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

1. The [Bald and Golden Eagle Protection Act](#) of 1940.
2. The [Migratory Birds Treaty Act](#) of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act (MBTA). Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their nests, should follow appropriate regulations and implement required avoidance and minimization measures, as described in the various links on this page.

The data in this location indicates that no eagles have been observed in this area. This does not mean eagles are not present in your project area, especially if the area is difficult to survey.

Please review the 'Steps to Take When No Results Are Returned' section of the Supplemental Information on Migratory Birds and Eagles document to determine if your project is in a poorly surveyed area. If it is, you may need to rely on other resources to determine if eagles may be present (e.g. your local FWS field office, state surveys, your own surveys).

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) ¹ prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25
Dickcissel <i>Spiza americana</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9453	Breeds May 5 to Aug 31
Forster's Tern <i>Sterna forsteri</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/11953	Breeds Mar 1 to Aug 15
Hudsonian Godwit <i>Limosa haemastica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9482	Breeds elsewhere

NAME	BREEDING SEASON
<p>Least Tern <i>Sternula antillarum antillarum</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/11919</p>	Breeds Apr 25 to Sep 5
<p>Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679</p>	Breeds elsewhere
<p>Long-billed Curlew <i>Numenius americanus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5511</p>	Breeds elsewhere
<p>Painted Bunting <i>Passerina ciris</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9511</p>	Breeds Apr 25 to Aug 15
<p>Prairie Loggerhead Shrike <i>Lanius ludovicianus excubitorides</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8833</p>	Breeds Feb 1 to Jul 31
<p>Prothonotary Warbler <i>Protonotaria citrea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9439</p>	Breeds Apr 1 to Jul 31
<p>Reddish Egret <i>Egretta rufescens</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/7617</p>	Breeds Mar 1 to Sep 15
<p>Ruddy Turnstone <i>Arenaria interpres morinella</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/10633</p>	Breeds elsewhere
<p>Short-billed Dowitcher <i>Limnodromus griseus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480</p>	Breeds elsewhere
<p>Swallow-tailed Kite <i>Elanoides forficatus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8938</p>	Breeds Mar 10 to Jun 30

NAME	BREEDING SEASON
Whimbrel <i>Numenius phaeopus hudsonicus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/11991	Breeds elsewhere
Willet <i>Tringa semipalmata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10669	Breeds Apr 20 to Aug 5

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

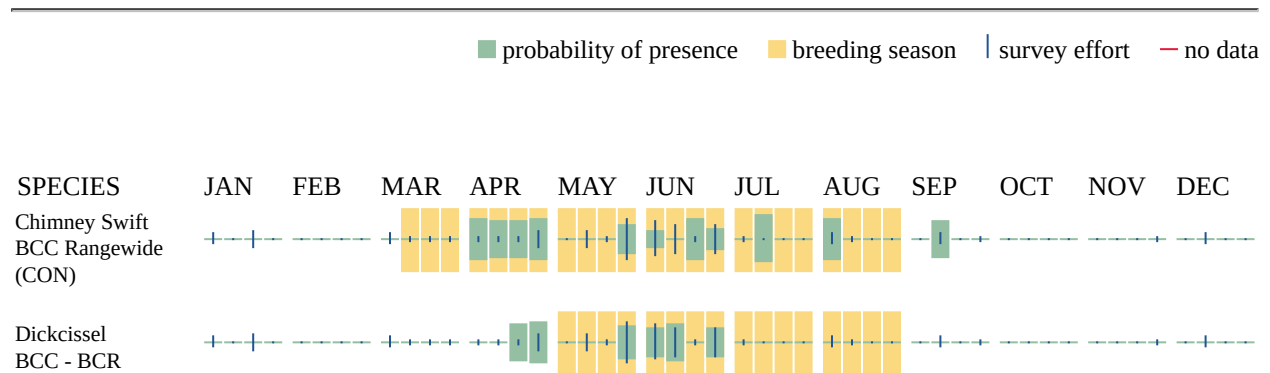
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

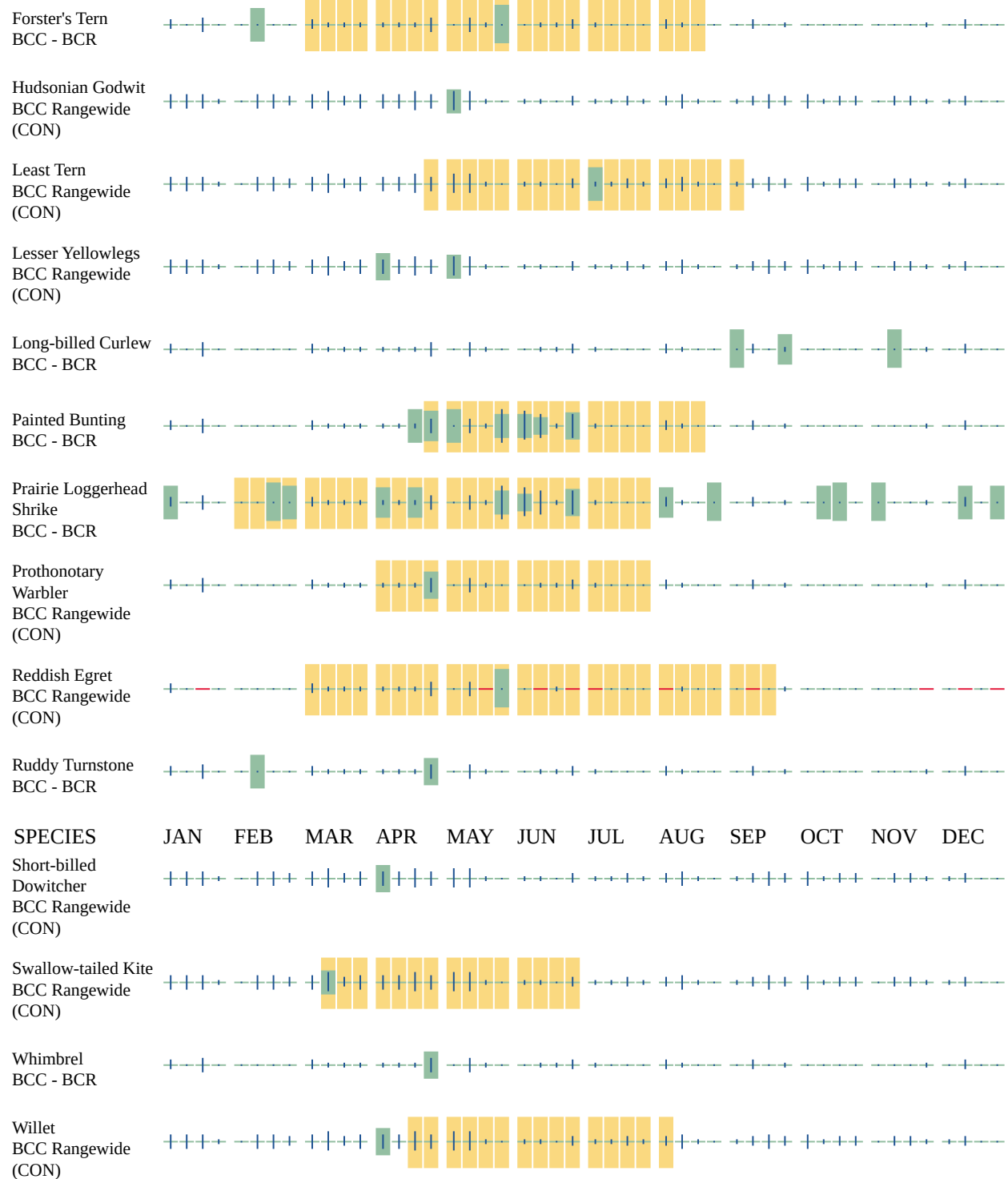
Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.





Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>

- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

FRESHWATER POND

- PUBKx

IPAC USER CONTACT INFORMATION

Agency: Corpus Christi city
Name: Tara Ducrest
Address: 4501 Gollihar
City: Corpus Christi
State: TX
Zip: 78411
Email: tducrest@hanson-inc.com
Phone: 3618149900

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Texas General Land Office

IPAC Biological Analysis

GREENWOOD WWTP FLOOD MITIGATION & BACKUP GENERATOR

BIOLOGICAL ANALYSIS

Prepared using IPaC

Generated by Tara Ducrest (tducrest@hanson-inc.com)

December 9, 2025

The purpose of this document is to assess the effects of the proposed project and determine whether the project may affect any federally threatened, endangered, proposed, or candidate species. If appropriate for the project, this document may be used as a biological assessment (BA), as it is prepared in accordance with legal requirements set forth under [Section 7 of the Endangered Species Act \(16 U.S.C. 1536 \(c\)\)](#).

In this document, any data provided by U.S. Fish and Wildlife Service is based on data as of November 4, 2025.

Prepared using IPaC version 6.128.17-rc2

GREENWOOD WWTP FLOOD MITIGATION & BACKUP GENERATOR BIOLOGICAL ASSESSMENT

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1 DESCRIPTION OF THE ACTION

1.1 PROJECT NAME

Greenwood WWTP Flood Mitigation & Backup Generator

1.2 EXECUTIVE SUMMARY

This project includes installation of emergency generators and flood mitigation improvements within the existing footprint of the Greenwood Wastewater Treatment Plant. No effects to species or critical habitat are anticipated from this project.

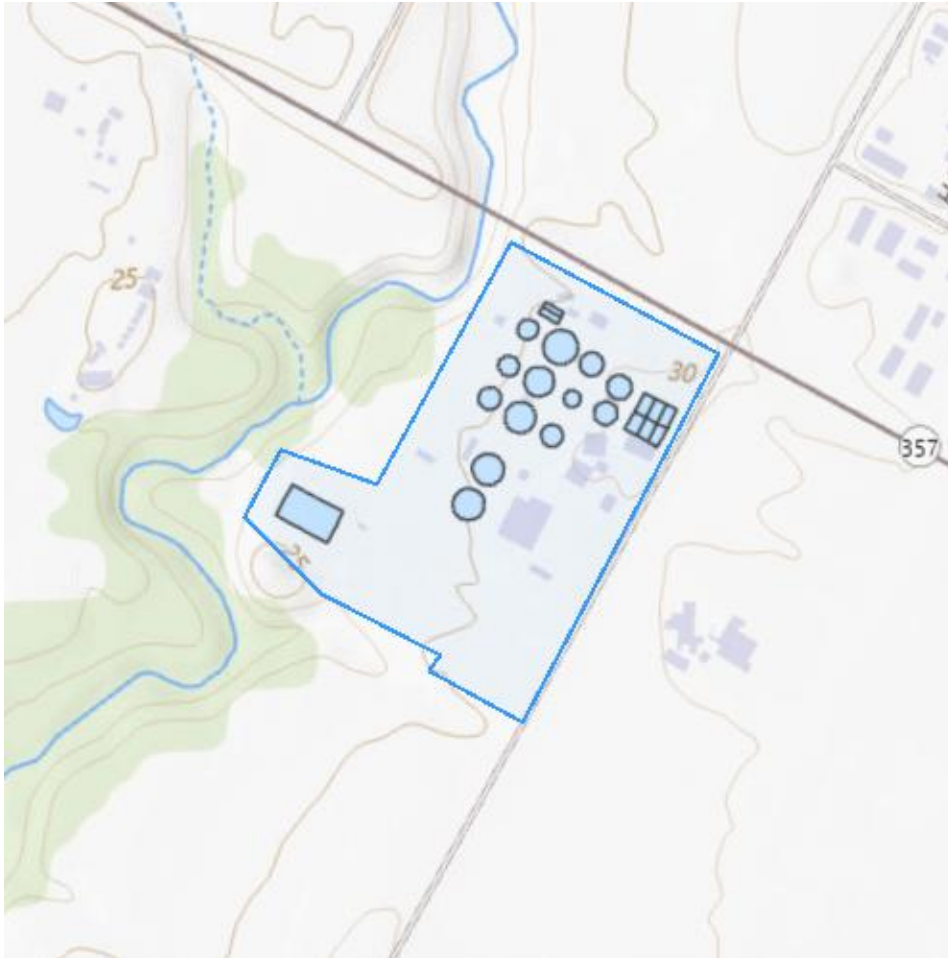
1.3 EFFECT DETERMINATION SUMMARY

SPECIES (COMMON NAME)	SCIENTIFIC NAME	LISTING STATUS	PRESENT IN ACTION AREA	EFFECT DETERMINATION
Eastern Black Rail	<i>Laterallus jamaicensis ssp. jamaicensis</i>	Threatened	No	NE
Green Sea Turtle	<i>Chelonia mydas</i>	Threatened	No	NE
Hawksbill Sea Turtle	<i>Eretmochelys imbricata</i>	Endangered	No	NE
Monarch Butterfly	<i>Danaus plexippus</i>	Proposed Threatened	Excluded from analysis	Excluded from analysis
Northern Aplomado Falcon	<i>Falco femoralis septentrionalis</i>	Endangered	No	NE
Piping Plover	<i>Charadrius melodus</i>	Threatened	No	NE
Rufa Red Knot	<i>Calidris canutus rufa</i>	Threatened	No	NE
Slender Rush-pea	<i>Hoffmannseggia tenella</i>	Endangered	No	NE
South Texas Ambrosia	<i>Ambrosia cheiranthifolia</i>	Endangered	No	NE
Tricolored Bat [†] . This species or critical habitat is covered by a DKey.	<i>Perimyotis subflavus</i>	Proposed Endangered		NE
Whooping Crane	<i>Grus americana</i>	Endangered	No	NE

[†] This species or critical habitat has been analyzed through a Determination Key.

1.4 PROJECT DESCRIPTION

1.4.1 LOCATION



LOCATION

Nueces County, Texas

1.4.2 DESCRIPTION OF PROJECT HABITAT

The site is a previously developed wastewater treatment plant.

1.4.3 PROJECT PROPONENT INFORMATION

Provide information regarding who is proposing to conduct the project, and their contact information. Please provide details on whether there is a Federal nexus.

REQUESTING AGENCY

FULL NAME

Tara Ducrest

STREET ADDRESS

4501 Gollihar

CITY

Corpus Christi

STATE

TX

ZIP

78411

PHONE NUMBER

3618149900

E-MAIL ADDRESS

tducrest@hanson-inc.com

LEAD AGENCY

State of Texas

Texas General Land Office

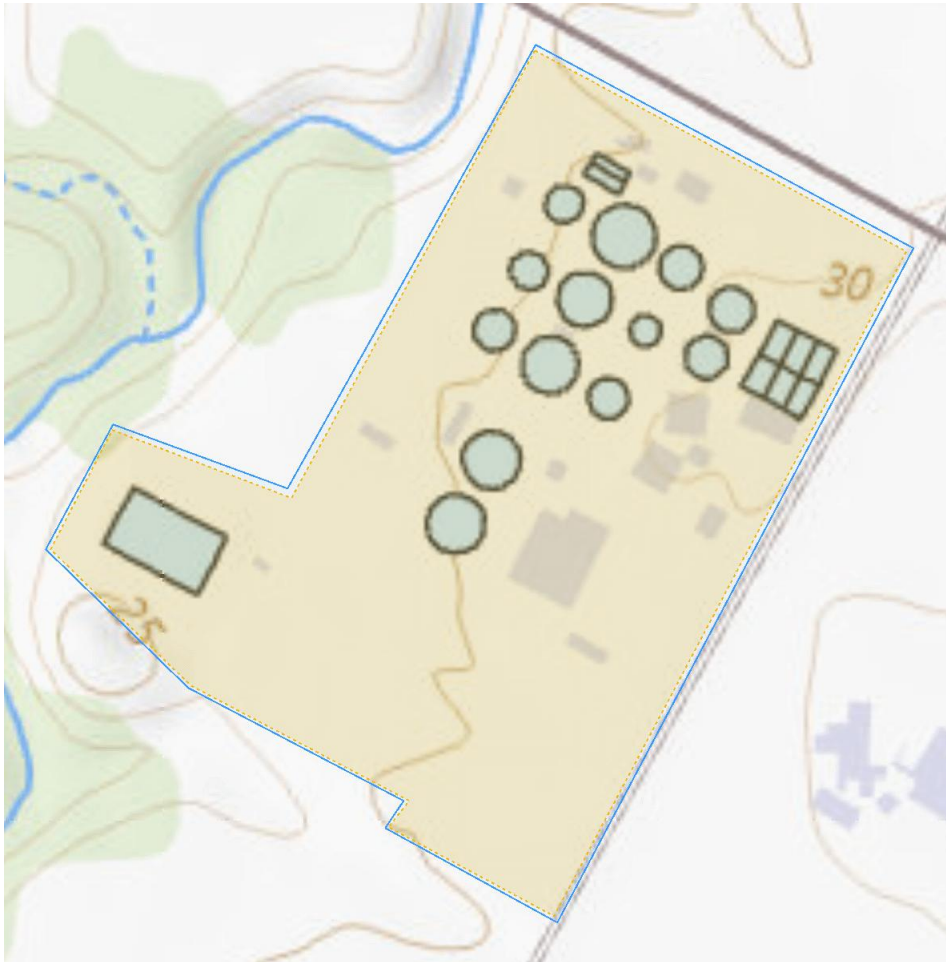
1.4.4 PROJECT PURPOSE

The purpose of the project is to install emergency generators and mitigate potential flood damages to the Greenwood WWTP and allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. Under this project, measures are proposed to protect those structures that are most susceptible to flooding inside the plant along with interior drainage system improvements and grading improvements to collect stormwater from the critical areas within the plant that are prone to ponding in and around plant facilities (<https://null>).

1.4.5 PROJECT TYPE AND DECONSTRUCTION


This project is a wastewater treatment plant construction project.

1.4.5.1 PROJECT MAP



LEGEND

 Project footprint

 Emergency Generators, Site Grading, Utility Tie In: Finish grading, in-ground utilities construction, install specific wastewater treatment components, prepare the project site (terrestrial), wastewater treatment plant emergency generator (structure)

1.4.5.2 WASTEWATER TREATMENT PLANT EMERGENCY GENERATOR

STRUCTURE COMPLETION DATE

January 01, 2027

REMOVAL/DECOMMISSION DATE (IF APPLICABLE)

January 01, 2028

STRESSORS

This activity is not expected to have any impact on the environment.

DESCRIPTION

Emergency generators will be installed within the existing footprint of the Greenwood WWTP. Stressors are not anticipated to occur.

1.4.5.3 FINISH GRADING

ACTIVITY START DATE

January 01, 2027

ACTIVITY END DATE

January 01, 2028

STRESSORS

This activity is not expected to have any impact on the environment.

DESCRIPTION

Finish grading will occur with installation of the emergency generators and flood mitigation improvements. Stressors are not anticipated to occur.

1.4.5.4 IN-GROUND UTILITIES CONSTRUCTION

ACTIVITY START DATE

January 01, 2027

ACTIVITY END DATE

January 01, 2028

STRESSORS

This activity is not expected to have any impact on the environment.

DESCRIPTION

The project will involve installation of emergency generators at the Greenwood WWTP. Construction will include buried conduit/cables to connect the WWTP to the generator.

1.4.5.5 INSTALL SPECIFIC WASTEWATER TREATMENT COMPONENTS

ACTIVITY START DATE

January 01, 2027

ACTIVITY END DATE

January 01, 2028

STRESSORS

This activity is not expected to have any impact on the environment.

DESCRIPTION

Flood mitigation improvements will be made within the existing footprint of the Greenwood WWTP. Stressors are not anticipated to occur.

1.4.5.6 PREPARE THE PROJECT SITE (TERRESTRIAL)

ACTIVITY START DATE

January 01, 2027

ACTIVITY END DATE

January 01, 2028

STRESSORS

This activity is not expected to have any impact on the environment.

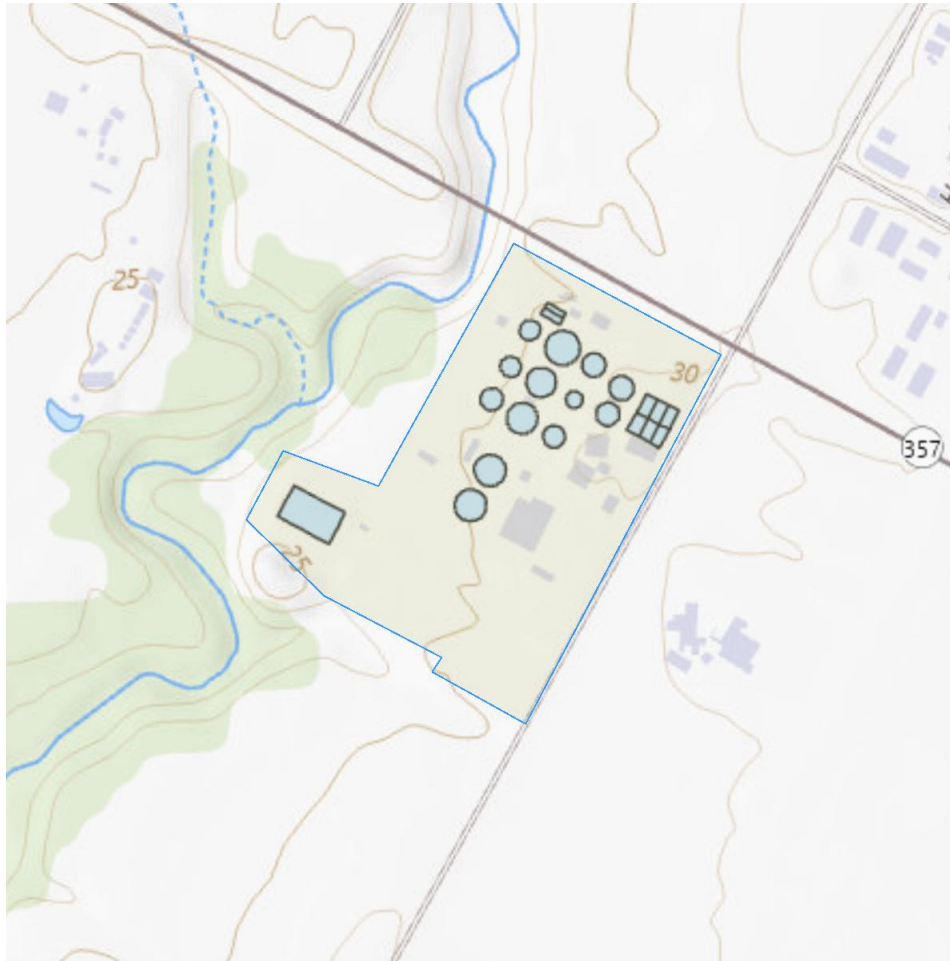
DESCRIPTION

The project will involve preparing the site for installation of emergency generators and flood mitigation improvements within the existing footprint of the Greenwood WWTP. Stressors are not anticipated to occur.



1.4.6 ANTICIPATED ENVIRONMENTAL STRESSORS

Describe the anticipated effects of your proposed project on the aspects of the land, air and water that will occur due to the activities above. These should be based on the activity deconstructions done in the previous section and will be used to inform the action area.

1.5 ACTION AREA



LEGEND

-  Project footprint
-  Stressor location

1.6 CONSERVATION MEASURES

1.7 PRIOR CONSULTATION HISTORY

No prior consultation for this project has occurred.

1.8 OTHER AGENCY PARTNERS AND INTERESTED PARTIES

No other agencies are involved in the project.

1.9 OTHER REPORTS AND HELPFUL INFORMATION

No other report are available for this project.

2 SPECIES EFFECTS ANALYSIS

This section describes, species by species, the effects of the proposed action on listed, proposed, and candidate species, and the habitat on which they depend. In this document, effects are broken down as direct interactions (something happening directly to the species) or indirect interactions (something happening to the environment on which a species depends that could then result in effects to the species).

These interactions encompass effects that occur both during project construction and those which could be ongoing after the project is finished. All effects, however, should be considered, including effects from direct and indirect interactions and cumulative effects.

2.1 EASTERN BLACK RAIL

This species has been excluded from analysis in this environmental review document.

JUSTIFICATION FOR EXCLUSION

The required habitat of dense vegetative cover is not present at the previously developed project area.

2.2 GREEN SEA TURTLE

This species has been excluded from analysis in this environmental review document.

JUSTIFICATION FOR EXCLUSION

The required habitat of inshore and nearshore waters is not present at the previously developed project area.

2.3 HAWKSBILL SEA TURTLE

This species has been excluded from analysis in this environmental review document.

JUSTIFICATION FOR EXCLUSION

The required habitat of ocean and nearshore foraging grounds is not present at the previously developed project area.

2.4 MONARCH BUTTERFLY

This species has been excluded from analysis in this environmental review document.

JUSTIFICATION FOR EXCLUSION

The required habitat of sufficient quantity/quality of milkweed is not present at the previously developed project area.

2.5 NORTHERN APLOMADO FALCON

This species has been excluded from analysis in this environmental review document.

JUSTIFICATION FOR EXCLUSION

The required habitat of palm and oak savannahs, desert grassland, and open pine woodlands is not present at the previously developed project area.

2.6 PIPING PLOVER

This species has been excluded from analysis in this environmental review document.

JUSTIFICATION FOR EXCLUSION

The required habitat of sand spits, small islands, tidal flats, shoals, and sandbars with inlets is not present at the previously developed project area.

2.7 RUFA RED KNOT

This species has been excluded from analysis in this environmental review document.

JUSTIFICATION FOR EXCLUSION

The required habitat of coastal marine and estuarine habitats with large areas of exposed intertidal sediments is not present at the previously developed project area.

2.8 SLENDER RUSH-PEA

This species has been excluded from analysis in this environmental review document.

JUSTIFICATION FOR EXCLUSION

The required habitat of openings amongst mesquite and other woody plants that have invaded short-grass coastal prairie remnants is not present at the previously developed project area.

2.9 SOUTH TEXAS AMBROSIA

This species has been excluded from analysis in this environmental review document.

JUSTIFICATION FOR EXCLUSION

The required habitat of grasslands and mesquite dominated shrublands is not present at the previously developed project area.

2.10 WHOOPING CRANE

This species has been excluded from analysis in this environmental review document.

JUSTIFICATION FOR EXCLUSION

The required habitat of coastal marshes, estuaries, inland marshes, lakes, open ponds, shallow bays, salt marsh, sand flats, tidal flats, upland swales, wet meadows, rivers, pastures, and agricultural fields is not present at the previously developed project area.

3 CRITICAL HABITAT EFFECTS ANALYSIS

No critical habitats intersect with the project action area.

4 SUMMARY DISCUSSION AND CONCLUSION

4.1 SUMMARY DISCUSSION

The project involves installation of emergency generators and flood mitigation improvements within the existing footprint of the Greenwood WWTP. No effects to species or critical habitat are anticipated from this project.

4.2 CONCLUSION

No effects are anticipated from this project.

Determination Letter for Tricolored Bat



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Texas Coastal & Central Plains Esfo
17629 El Camino Real, Suite 211
Houston, TX 77058-3051
Phone: (281) 286-8282 Fax: (281) 488-5882

In Reply Refer To:

12/09/2025 17:21:29 UTC

Project code: 2026-0011988

Project Name: Greenwood WWTP Flood Mitigation & Backup Generator

Federal Nexus: yes

Federal Action Agency (if applicable): Texas General Land Office

Subject: Record of project representative's no effect determination for 'Greenwood WWTP Flood Mitigation & Backup Generator'

Dear Tara Ducrest:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on December 09, 2025, for 'Greenwood WWTP Flood Mitigation & Backup Generator' (here forward, Project). This project has been assigned Project Code 2026-0011988 and all future correspondence should clearly reference this number. **Please carefully review this letter.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the **Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (Dkey)**, invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.***

Determination for the Northern Long-Eared Bat and/or Tricolored Bat

Based upon your IPaC submission and a standing analysis, your project has reached the following effect determinations:

Species	Listing Status	Determination
----------------	-----------------------	----------------------

Tricolored Bat (*Perimyotis subflavus*)Proposed
Endangered

No effect

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate.

To make a no effect determination, the full scope of the proposed project implementation (action) should not have any effects (either positive or negative), to a federally listed species or designated critical habitat. Effects of the action are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (See § 402.17).

Under Section 7 of the ESA, if a federal action agency makes a no effect determination, no consultation with the Service is required (ESA §7). If a proposed Federal action may affect a listed species or designated critical habitat, formal consultation is required except when the Service concurs, in writing, that a proposed action "is not likely to adversely affect" listed species or designated critical habitat [50 CFR §402.02, 50 CFR§402.13].

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Eastern Black Rail *Laterallus jamaicensis ssp. jamaicensis* Threatened
- Green Sea Turtle *Chelonia mydas* Threatened
- Hawksbill Sea Turtle *Eretmochelys imbricata* Endangered
- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Northern Aplomado Falcon *Falco femoralis septentrionalis* Endangered
- Piping Plover *Charadrius melodus* Threatened
- Rufa Red Knot *Calidris canutus rufa* Threatened
- Slender Rush-pea *Hoffmannseggia tenella* Endangered
- South Texas Ambrosia *Ambrosia cheiranthifolia* Endangered
- Whooping Crane *Grus americana* Endangered

You may coordinate with our Office to determine whether the Action may affect the animal species listed above and, if so, how they may be affected.

Next Steps

If there are no updates on listed species, no further consultation/coordination for this project is required with respect to the species covered by this key. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions occurs, additional coordination with the Service should take place to ensure compliance with the Act.

If you have any questions regarding this letter or need further assistance, please contact the Texas Coastal & Central Plains Esfo and reference Project Code 2026-0011988 associated with this Project.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

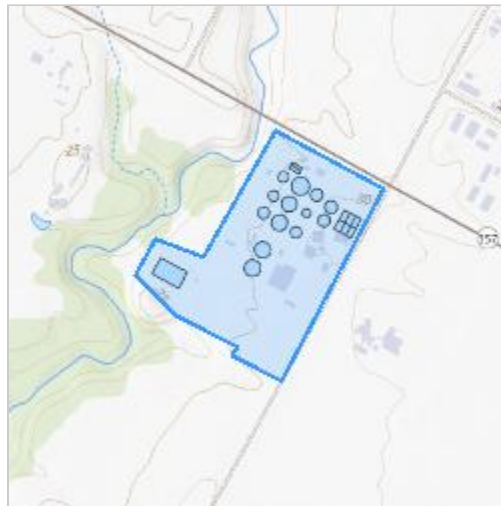
Greenwood WWTP Flood Mitigation & Backup Generator

2. Description

The following description was provided for the project 'Greenwood WWTP Flood Mitigation & Backup Generator':

The project is at the Greenwood Wastewater Treatment Plant (WWTP), which is located at 6541 Greenwood Drive to the southwest of the intersection of Greenwood Drive and Saratoga Boulevard in Corpus Christi, Nueces County, Texas 78417. The WWTP is at 27.719271° north latitude and -97.457559° west longitude. The purpose of this project is to install emergency generators and mitigate potential flood damages to the Greenwood WWTP and allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. Under this project, measures are proposed to protect those structures that are most susceptible to flooding inside the plant along with interior drainage system improvements and grading improvements to collect stormwater from the critical areas within the plant that are prone to ponding in and around plant facilities.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@27.71920725,-97.4576484989077,14z>



DETERMINATION KEY RESULT

Based on the information you provided, you have determined that the Proposed Action will have no effect on the species covered by this determination key. Therefore, no consultation with the U.S. Fish and Wildlife Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat. 884, as amended 16 U.S.C. 1531 *et seq.*) is required for those species.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species?

Note: Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

Automatically answered

Yes

3. Your project overlaps with Zone 2 of the area where northern long-eared bats and tricolored bats may be present and roosting in trees year-round.

Do you understand that your project may impact bats at any time during the year?

Yes

4. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

No

5. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

Note for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer 'yes' to this question.

Yes

6. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

No

7. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

No

8. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

No

9. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

No

10. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

Automatically answered

No

11. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

No

12. Will the action cause effects to a bridge?

Note: Covered bridges should be considered as bridges in this question.

No

13. Will the action result in effects to a culvert or tunnel at any time of year?

No

14. Are trees present within 1000 feet of the action area?

Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

15. Does the action include the intentional exclusion of bats from a building or building-like structure? **Note:** Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats or tricolored bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local Ecological Services Field Office to help assess whether northern long-eared bats or tricolored bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures.

No

16. Does the action involve removal, modification, or maintenance of a human-made building-like structure (barn, house, or other building) **known or suspected to contain roosting bats?**

No

17. Will the action cause construction of one or more new roads open to the public?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

18. Will the action include or cause any construction or other activity that is reasonably certain to increase average night-time traffic permanently or temporarily on one or more existing roads? **Note:** For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.). .

No

19. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

20. Will the proposed Action involve the creation of a new water-borne contaminant source (e.g., leachate pond, pits containing chemicals that are not NSF/ANSI 60 compliant)?

Note: For information regarding NSF/ANSI 60 please visit <https://www.nsf.org/knowledge-library/nsf-ansi-standard-60-drinking-water-treatment-chemicals-health-effects>

No

21. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

No

22. Will the action include drilling or blasting?

No

23. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use at night)?

No

24. Will the proposed action involve the use of herbicides or pesticides (e.g., fungicides, insecticides, or rodenticides)?

No

25. Will the action include or cause activities that are reasonably certain to cause chronic or intense nighttime noise (above current levels of ambient noise in the area) in suitable summer habitat for the northern long-eared bat or tricolored bat during the active season?

Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time. Sources of chronic or intense noise that could cause adverse effects to bats may include, but are not limited to: road traffic; trains; aircraft; industrial activities; gas compressor stations; loud music; crowds; oil and gas extraction; construction; and mining.

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

26. Does the action include, or is it reasonably certain to cause, the use of permanent or temporary artificial lighting within 1000 feet of suitable northern long-eared bat or tricolored bat roosting habitat?

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

27. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

No

28. Will the proposed action result in the use of prescribed fire?

Note: If the prescribed fire action includes other activities than application of fire (e.g., tree cutting, fire line preparation) please consider impacts from those activities within the previous representative questions in the key. This set of questions only considers impacts from flame and smoke.

No

29. Does the action area intersect the tricolored bat species list area?

Automatically answered

Yes

30. Is the action area located within 0.5-mile of radius of an entrance/opening to any known tricolored bat hibernacula or winter roost?

Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

Automatically answered

No

31. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats? **Note:** The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

Automatically answered

No

32. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

Has a presence/probable absence survey for the tricolored bat following the Service's [Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#) been conducted within the project area? If unsure, answer "No."

No

33. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

Is suitable tricolored bat habitat present within 1000 feet of project activities? Note: If there are trees within the action area that may provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pines) answer "Yes." Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

34. Do you have any documents that you want to include with this submission?

No

PROJECT QUESTIONNAIRE

IPAC USER CONTACT INFORMATION

Agency: Corpus Christi city
Name: Tara Ducrest
Address: 4501 Gollihar
City: Corpus Christi
State: TX
Zip: 78411
Email: tducrest@hanson-inc.com
Phone: 3618149900

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Texas General Land Office

**Attachment H –
Acceptable Separation Distance Calculations
and Map**

Home (/) > Programs (/programs/) > Environmental Review (/programs/environmental-review/) > ASD Calculator

Acceptable Separation Distance (ASD) Electronic Assessment Tool

The Environmental Planning Division (EPD) has developed an electronic-based assessment tool that calculates the Acceptable Separation Distance (ASD) from stationary hazards. The ASD is the distance from above ground stationary containerized hazards of an explosive or fire prone nature, to where a HUD assisted project can be located. The ASD is consistent with the Department's standards of blast overpressure (0.5 psi-buildings) and thermal radiation (450 BTU/ft² - hr - people and 10,000 BTU/ft² - hr - buildings). Calculation of the ASD is the first step to assess site suitability for proposed HUD-assisted projects near stationary hazards. Additional guidance on ASDs is available in the Department's guidebook "Siting of HUD- Assisted Projects Near Hazardous Facilities" and the regulation 24 CFR Part 51, Subpart C, Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature.

Note: Tool tips, containing field specific information, have been added in this tool and may be accessed by hovering over the ASD result fields with the mouse.

Acceptable Separation Distance Assessment Tool

Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
What is the volume (gal) of the container?	<input type="text"/>
What is the Diked Area Length (ft)?	<input type="text" value="25"/>
What is the Diked Area Width (ft)?	<input type="text" value="15"/>
<input type="button" value="Calculate Acceptable Separation Distance"/>	
Diked Area (sqft)	<input type="text" value="375"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>

ASD for Blast Over Pressure (ASDBOP)	
ASD for Thermal Radiation for People (ASDPPU)	
ASD for Thermal Radiation for Buildings (ASDBPU)	
ASD for Thermal Radiation for People (ASDPNPD)	102.67
ASD for Thermal Radiation for Buildings (ASDBNPD)	16.89

For mitigation options, please click on the following link: [Mitigation Options \(/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/\)](/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/)

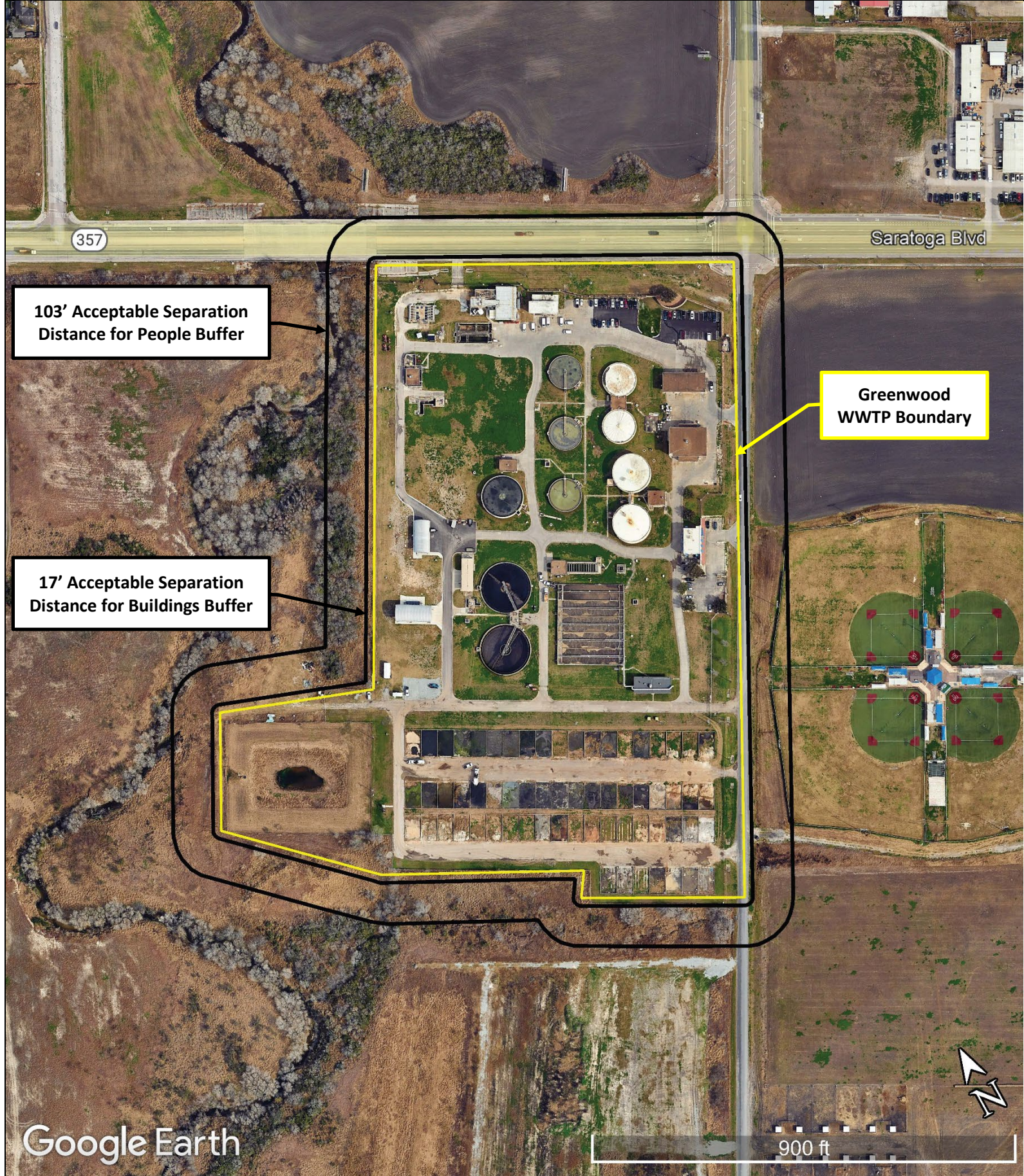
Providing Feedback & Corrections

After using the ASD Assessment Tool following the directions in this User Guide, users are encouraged to provide feedback on how the ASD Assessment Tool may be improved. Users are also encouraged to send comments or corrections for the improvement of the tool.

Please send comments or other input using the **Contact Us** (<https://www.hudexchange.info/contact-us/>) form.

Related Information

- [ASD User Guide \(/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/\)](/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/)
- [ASD Flow Chart \(/resource/3840/acceptable-separation-distance-asd-flowchart/\)](/resource/3840/acceptable-separation-distance-asd-flowchart/)



103' Acceptable Separation Distance for People Buffer

17' Acceptable Separation Distance for Buildings Buffer

Greenwood WWTP Boundary

Google Earth

900 ft



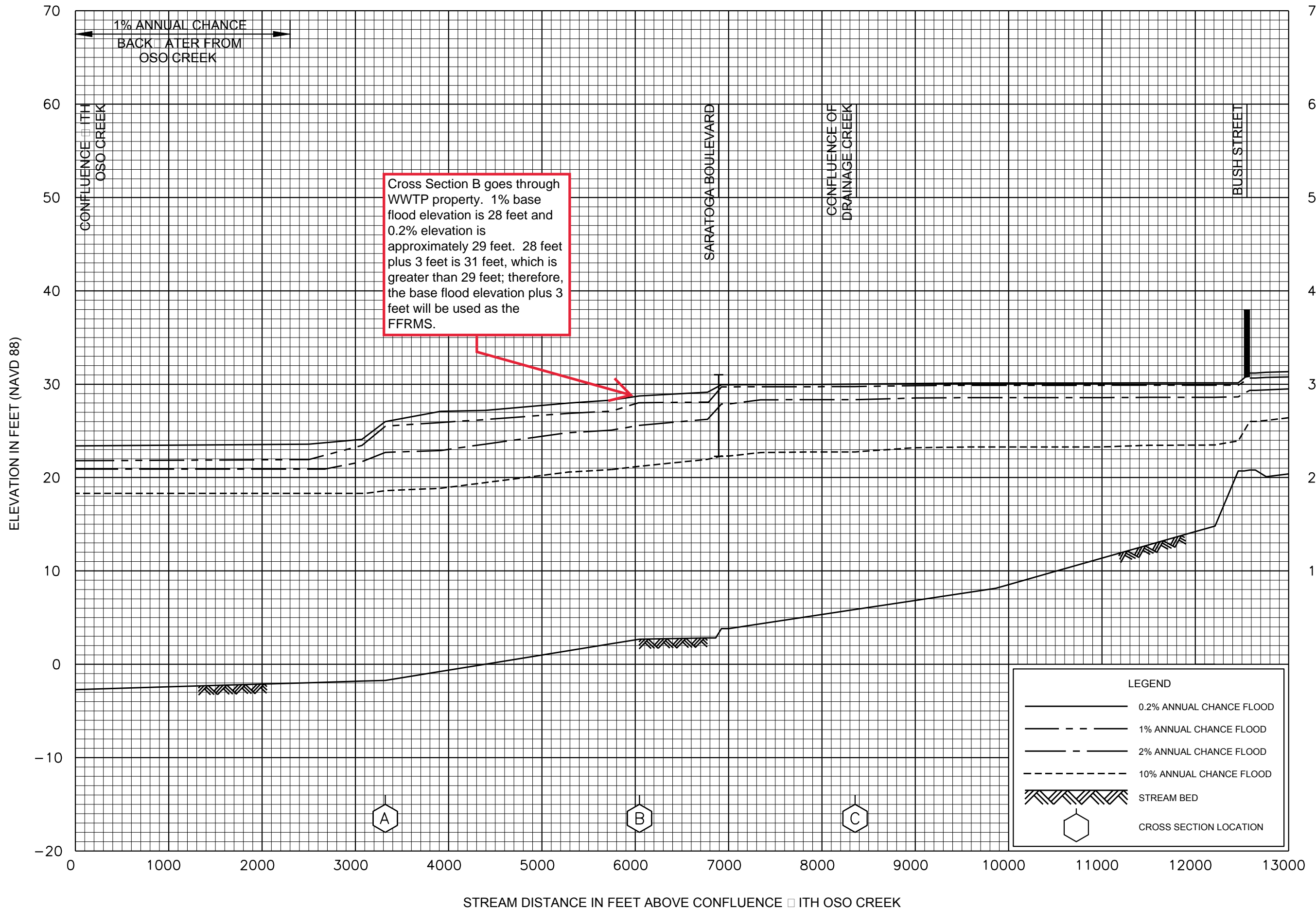
Note: Property Boundaries Shown are Approximate.

Drawn By:	TLD	Scale:	As Shown
Project Number:	24L0174A_07	Date:	12/9/25

Acceptable Separation Distances Map
 Greenwood WWTP
 6541 Greenwood Drive, Corpus Christi, Nueces County, Texas

Attachment I –

**Oso Creek Tributary No. 10 Flood Profile and 8-Step
Process Documentation**



FLOOD PROFILES

OSO CREEK TRIBUTARY NO. 10

FEDERAL EMERGENCY MANAGEMENT AGENCY

NUECES COUNTY, TX
AND INCORPORATED AREAS

8-STEP DECISION-MAKING PROCESS – Greenwood WWTP Flood Mitigation & Backup Generators

The project involves installation of emergency generators and completion of flood mitigation improvements at the Greenwood Wastewater Treatment Plant (WWTP) at 6541 Greenwood Drive, Corpus Christi, Nueces County, Texas.

--Decision-Making Process for E.O. 11988 and E.O. 13690 as Provided by 24 CFR §55.20

Step 1

Determine whether the action is located within the Federal Flood Risk Management Standard (FFRMS) floodplain using the Climate-Informed-Science-Approach (CISA) which applies the best-available, actionable, hydrologic and hydraulic data; the 0.2-Percent-Annual-Chance (500-Year) Flood Approach which uses the elevation and flood hazard area as depicted by the 0.2-Percent-Annual-Chance floodplain; or the Freeboard-Value-Approach (FVA) = Base-Flood-Elevation or 100-year floodplain (BFE+2' or BFE+3' for critical actions) to calculate the FFRMS floodplain elevation.

This project includes installation of emergency generators and completion of flood mitigation improvements at the Greenwood WWTP. No CISA data is available for this area. According to flood insurance rate maps from FEMA's Map Service Center, there is a 500-year floodplain (or '0.2-percent-annual-chance floodplain') at the WWTP, and the project could temporarily impact approximately one acre of floodplain. The project is in the FFRMS floodplain and portions of the flood mitigation improvements will be in a Special Flood Hazard Area, including a floodway. Impacts to the floodway are estimated to be 0.1 acre. See FEMA map panel #48355C0505G, effective 10/13/2022. Because the project is a critical action, comparison of the 0.2-percent-annual-chance floodplain with the freeboard value approach is necessary. Based on the flood profile for Oso Creek Tributary No. 10 from the Flood Insurance Study for Nueces County, Texas, and Incorporated Areas, Volume 2 of 3, the 0.2-percent-annual-chance floodplain elevation at the Greenwood WWTP is 29 feet and the base flood elevation is 28 feet. Adding the required three feet to the base flood elevation brings the freeboard-value-approach elevation to 31 feet, which is greater than the 0.2-percent-annual-chance floodplain elevation of 29 feet; therefore, the FFRMS floodplain elevation at the Greenwood WWTP will be 31 feet. The flood profile for Oso Creek Tributary No. 10 is provided as an attachment to the Floodplain Management worksheet.

A floodway exemption from 24 CFR § 55.20 applies; therefore, the 8-step process is required.

Step 2

Notify the public for early review of the proposal and involve the affected and interested public in the decision-making process.

A public notice was published on the City of Corpus Christi website at <https://www.corpuschristitx.gov/department-directory/corpus-christi-water/cdbg-mitigation-funded-projects/> on January 23, 2026. The notice was also published in Spanish. Public comments were accepted through February 9, 2026.

The notice included the project name, proposed location, and description of the activity; the total number of acres of floodplain involved; the related natural and beneficial functions and values of the floodplain that may be adversely affected by the proposed activity; the name of the Certifying Officer (Mayor of Corpus Christi); and the phone number to call for information. The notice included the hours of the City's office as well. Copies of the notices are included in the environmental review record.

No comments on the notice were received.

Step 3

Identify and evaluate practicable alternatives.

The City of Corpus Christi considered that the project is occurring at an existing WWTP, which provides service to 64,336 people. Options considered include Option A, "Greenwood WWTP Flood Mitigation & Backup Generators," and Option B, "No Action Alternative,":

Under Option A, "Greenwood WWTP Flood Mitigation & Backup Generators," the City of Corpus Christi would complete the proposed project to mitigate potential flood damages to the Greenwood WWTP and allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. Under this option, measures are proposed to protect those structures that are most susceptible to flooding inside the plant along with interior drainage system improvements and grading improvements to collect stormwater from the critical areas within the plant that are prone to ponding in and around plant facilities. The major improvements include site grading, piping and floodway improvements; flooding walls for identified plant structures; a new effluent pump station (EPS) of firm capacity up to 36 MGD; and miscellaneous improvements. The project also includes installation of emergency generators, installation of instrumentation and an electrical control system for automatic switching between grid power and emergency generators, and miscellaneous improvements related to emergency generators. This option is the proposed option.

Under the "No Action Alternative," the City of Corpus Christi would not complete the flood mitigation improvements to the Greenwood WWTP. The WWTP would continue

to experience flooding and potentially impact water quality from sanitary sewer overflows.

Step 4

Identify potential direct and indirect impacts associated with floodplain development.

Descriptions of the potential impacts from the proposed actions are below:

Option A – This option would involve completing flood mitigation measures and installing emergency generators at the WWTP. Option A would reduce flooding and sanitary sewer overflows at the WWTP.

Option B – This option would involve not completing flood mitigation measures or installing emergency generators at the WWTP. If Option B was selected, the WWTP would continue to experience flooding and potentially impact water quality from sanitary sewer overflows.

Step 5

Where practicable, design or modify the proposed action to minimize the potential adverse impacts to lives, property, and natural values within the floodplain and to restore and preserve the values of the floodplain.

(a) Preserving Lives: The project is not anticipated to have an adverse impact on lives. The project will benefit employee safety at the WWTP when employees may need to access wastewater treatment units during flooding conditions.

(b) Preserving Property: The project is not anticipated to have an adverse impact on property. The project will benefit the treatment units at the Greenwood WWTP by protecting them from flooding conditions.

(c) Preserving Natural Values and Minimizing Impacts: The flood mitigation improvements will comply with the City of Corpus Christi Flood Hazard Prevention Code.

Step 6

Reevaluate the alternatives

Option A would allow flooding conditions to be minimized at the Greenwood WWTP, resulting in fewer sanitary sewer overflows. Option A is selected because it addresses flooding at the WWTP and impacts to the floodplain will be minimized.

Option B is impracticable and was not selected because it would not address flooding conditions at the Greenwood WWTP.

Step 7

Determination of no practicable alternative and publication of final notice

The City of Corpus Christi determines that there is no practicable alternative for partially locating the project within the FFRMS floodplain. This is due to: 1) the need to provide flood improvements to wastewater treatment units that already exist in the floodplain; 2) the need to provide safe working conditions during flooding conditions at the WWTP; 3) the need to construct an economically feasible project; and 4) the ability to mitigate and minimize impacts on life, property, and natural values in the floodplain.

A final notice was published on the City of Corpus Christi website, <https://www.corpuschristitx.gov/departments-directory/corpus-christi-water/cdbg-mitigation-funded-projects/>, on February 16, 2026, detailing the reasons why the project must be located within the floodplain, a list of alternatives considered, and all mitigation measures taken to minimize adverse impacts and preserve natural and beneficial floodplain values. Public comments were accepted from February 16, 2026 through February 24, 2026. The notice was also published in Spanish. The notice included the project name, proposed location, and description of the activity; the total number of acres of floodplain involved; the related natural and beneficial functions and values of the floodplain that may be adversely affected by the proposed activity; the comments on the first notice and how they were addressed; the name of the Certifying Officer (Mayor of Corpus Christi); and the phone number to call for information. The notice included the hours of the City's office as well. Copies of the notices are included in the environmental review record.

No comments on the final notice were received.

Step 8

Implement the proposed action

The City of Corpus Christi will ensure that all mitigation measures prescribed in the steps above are adhered to. The City of Corpus Christi will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken.

**Early Notice and Public Review of a Proposed
Activity in a Federal Flood Risk Management Standard Designated Floodplain**

To: All interested Agencies, Groups, and Individuals

This is to give notice that the City of Corpus Christi under 24 CFR Part 58 has determined that the following proposed action under the Community Development Block Grant (CDBG) Mitigation (MIT) Program, HUD Grant Number 24-065-091-E767 is located in the Federal Flood Risk Management Standard (FFRMS) floodplain, and the City of Corpus Christi will be identifying and evaluating practicable alternatives to locating the action within the floodplain and the potential impacts on the floodplain from the proposed action, as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands. The proposed project location is at 6541 Greenwood Drive in Corpus Christi, Nueces County, Texas. The extent of the FFRMS floodplain was determined using a freeboard value approach.

The project involves mitigation to potential flood damages at the existing Greenwood Wastewater Treatment Plant (WWTP). The project is being done to allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. Under this project, measures are proposed to protect those structures that are most susceptible to flooding inside the plant along with interior drainage system improvements and grading improvements to collect stormwater from the critical areas within the plant that are prone to ponding in and around plant facilities. The major improvements include the following items: site grading, piping and floodway improvements, flood walls for identified plant structures, a new effluent pump station (EPS) of firm capacity up to 36 MGD, and miscellaneous improvements. The project is in the FFRMS floodplain and portions of the flood mitigation improvements will be in a floodway. Approximately one acre of the floodplain will be temporarily impacted, with approximately 0.1 acre of floodway impacts. The impacted floodplain provides the following natural and beneficial functions: flood risk reduction and floodwater storage.

There are three primary purposes for this notice. First, people who may be affected by activities in the FFRMS floodplain and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the FFRMS floodplain, alternative methods to serve the same project purpose, and methods to minimize and mitigate project impacts. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about FFRMS floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in FFRMS floodplains, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Corpus Christi at the following address on or before February 9, 2026:

City of Corpus Christi
Mayor's Office
P.O. Box 9277, Corpus Christi, TX 78469
(361) 826-3100
Attn: Paulette Guajardo, Mayor

A full description of the project may also be reviewed at <https://www.corpuschristitx.gov/department-directory/corpus-christi-water/cdbg-mitigation-funded-projects/>.

Comments may also be submitted via email at Paulette.Guajardo@CorpusChristi.TX.gov.

Date: January 23, 2026

**Aviso Anticipado y Revisión Pública de una Propuesta
Actividad en una Norma Federal de Gestión del Riesgo de Inundaciones Designada como Llanura
de Inundación**

Para: Todas las agencias, grupos e individuos interesados

Se notifica que la Ciudad de Corpus Christi, bajo el 24 CFR Parte 58, ha determinado que la siguiente acción propuesta bajo el Programa de Mitigación (MIT) de Subvención Bloqueada para el Desarrollo Comunitario (CDBG), Subvención HUD número 24-065-091-E767, se encuentra en la llanura de inundación del Estándar Federal de Gestión de Riesgos de Inundaciones (FFRMS), y la Ciudad de Corpus Christi identificará y evaluará alternativas prácticas para ubicar la acción dentro de la llanura de inundación y los posibles impactos en la llanura de inundación derivados de la acción propuesta, según lo exigido por la Orden Ejecutiva 11988, conforme a las regulaciones del HUD en 24 CFR 55.20 en la Subparte C Procedimientos para Tomar Determinaciones sobre la Gestión y Protección de Humedales en Llanura de Inundación. La ubicación propuesta del proyecto es en 6541 Greenwood Drive en Corpus Christi, condado de Nueces, Texas. La extensión de la llanura de inundación FFRMS se determinó mediante un enfoque de valor de francobordo.

El proyecto consiste en mitigar posibles daños por inundación en la actual Planta de Tratamiento de Aguas Wastewater de Greenwood (WWTP). El proyecto se está llevando a cabo para permitir que la planta mantenga la integridad del proceso de tratamiento durante eventos meteorológicos extremos como huracanes y tormentas tropicales. En el marco de este proyecto, se proponen medidas para proteger aquellas estructuras más susceptibles a inundaciones dentro de la planta, junto con mejoras en el sistema de drenaje interior y mejoras en nivelación para recoger aguas pluviales de las áreas críticas dentro de la planta que son propensas a acumularse en y alrededor de las instalaciones de la planta. Las principales mejoras incluyen los siguientes elementos: nivelación del terreno, mejoras en tuberías y canales de inundación, muros de inundación para estructuras de plantas identificadas, una nueva estación de bombeo de efluentes (EPS) con capacidad firme de hasta 36 MGD, y mejoras varias. El proyecto se encuentra en la llanura de inundación del FFRMS y partes de las mejoras de mitigación de inundaciones estarán en un canal de inundación. Aproximadamente una hectárea de la llanura de inundación se verá afectada temporalmente, con aproximadamente 0,1 acres de impactos en la zona de desagüe. La llanura de inundación afectada proporciona las siguientes funciones naturales y beneficiosas: reducción del riesgo de inundación y almacenamiento de agua de inundación.

Este aviso tiene tres propósitos principales. En primer lugar, las personas que puedan verse afectadas por actividades en la llanura de inundación del FFRMS y aquellas que tengan interés en la protección del medio ambiente natural deberían tener la oportunidad de expresar sus preocupaciones y proporcionar información sobre estas áreas. Se anima a los comentaristas a ofrecer sitios alternativos fuera de la llanura de inundación del FFRMS, métodos alternativos para cumplir el mismo propósito del proyecto y métodos para minimizar y mitigar los impactos del proyecto. En segundo lugar, un programa adecuado de aviso público puede ser una herramienta educativa importante para el público en general. La difusión de información y la solicitud de comentarios públicos sobre las llanuras de inundación del FFRMS pueden facilitar y reforzar los esfuerzos federales para reducir los riesgos e impactos asociados a la ocupación y modificación de estas áreas especiales. Tercero, por equidad, cuando el gobierno federal determine que participará en acciones que se lleven a cabo en las llanuras de inundación del FFRMS, debe informar a quienes puedan estar en mayor o continuo riesgo.

Los comentarios escritos deben ser recibidos por la Ciudad de Corpus Christi en la siguiente dirección antes del 9 de febrero de 2026:

City of Corpus Christi
Mayor's Office
P.O. Box 9277, Corpus Christi, TX 78469
(361) 826-3100
Attn: Paulette Guajardo, Mayor

También puede revisarse una descripción completa del proyecto en <https://www.corpuschristitx.gov/department-directory/corpus-christi-water/cdbg-mitigation-funded-projects/>.

Los comentarios también pueden enviarse por correo electrónico en Paulette.Guajardo@CorpusChristi.TX.gov.

Fecha: 23 de enero de 2026

POSTED
2/16/2026 8:41:19 AM
Rebecca Huerta
City Secretary

Final Notice and Public Explanation of a Proposed Activity in a Federal Flood Risk Management Standard (FFRMS) Designated Floodplain

To: All interested Agencies, Groups, and Individuals

This is to give notice that the City of Corpus Christi has conducted an evaluation as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Wetlands Protection. The activity is funded under the Community Development Block Grant (CDBG) Mitigation (MIT) Program, HUD Grant Number 24-065-091-E767. The proposed project(s) is located at 6541 Greenwood Drive in Corpus Christi, Nueces County, Texas and is located in the Federal Flood Risk Management Standard (FFRMS) floodplain. The extent of the FFRMS floodplain was determined using a freeboard value approach.

The project involves mitigation to potential flood damages at the existing Greenwood Wastewater Treatment Plant (WWTP). The project is being done to allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. The project is in the FFRMS floodplain and portions of the flood mitigation improvements will be in a floodway. Approximately one acre of the floodplain will be temporarily impacted, with approximately 0.1 acre of floodway impacts.

The City of Corpus Christi has considered the following alternatives and mitigation measures to minimize adverse impacts and to restore and preserve natural and beneficial functions and intrinsic values of the existing floodplain/wetland: The project must take place in the floodplain because existing WWTP treatment units are located within the floodplain. The City of Corpus Christi considered that the project is occurring at an existing WWTP, which provides service to 64,336 people. Options considered include Option A, "Greenwood WWTP Flood Mitigation & Backup Generators," and Option B, "No Action Alternative,": Under Option A, "Greenwood WWTP Flood Mitigation & Backup Generators," the City of Corpus Christi would complete the project to mitigate potential flood damages to the Greenwood WWTP and allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. Under this option, mitigation measures are proposed to protect those structures that are most susceptible to flooding inside the plant along with interior drainage system improvements and grading improvements to collect stormwater from the critical areas within the plant that are prone to ponding in and around plant facilities. The major improvements include site grading, piping and floodway improvements; flood walls for identified plant structures; a new effluent pump station (EPS) of firm capacity up to 36 MGD; and miscellaneous improvements. The project also includes tasks that will not occur in the floodplain, including installation of emergency generators, installation of instrumentation and an electrical control system for automatic switching between grid power and emergency generators, and miscellaneous improvements related to emergency generators. Under the "No Action Alternative," the City of Corpus Christi would not complete the flood mitigation improvements to the Greenwood WWTP. The "No Action Alternative" was not selected because the WWTP would continue to experience flooding and potentially impact water quality from sanitary sewer overflows. The flood mitigation improvements will comply with the City of Corpus Christi Flood Hazard Prevention Code.

The City of Corpus Christi has reevaluated alternatives to building in the FFRMS floodplain and has determined that it has no practicable alternative to floodplain development. Environmental files documenting compliance with Executive Order 11988, are available for public inspection, review and copying upon request at the times and location delineated in the last paragraph of this notice for receipt of comments.

There are three primary purposes for this notice. First, people who may be affected by activities in the FFRMS floodplain and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about FFRMS floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in FFRMS floodplains, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Corpus Christi at the following address on or before February 24, 2026:

City of Corpus Christi
Mayor's Office
P.O. Box 9277, Corpus Christi, TX 78469
(361) 826-3100
Attn: Paulette Guajardo, Mayor

A full description of the project may also be reviewed from 8:00 a.m. to 5:00 p.m. at 1201 Leopard Street, Corpus Christi, TX 78401 and at <https://www.corpuschristitx.gov/department-directory/corpus-christi-water/cdbg-mitigation-funded-projects/>. Comments may also be submitted via email at Paulette.Guajardo@CorpusChristi.TX.gov.

Date: February 16, 2026

Aviso final y explicación pública de una actividad propuesta en una llanura de inundación designada por la Norma Federal de Gestión del Riesgo de Inundaciones (FFRMS)

Para: Todas las agencias, grupos e individuos interesados

Se notifica que la Ciudad de Corpus Christi ha realizado una evaluación según lo exigido por la Orden Ejecutiva 11988, de acuerdo con las regulaciones del HUD en 24 CFR 55.20 en la Subparte C Procedimientos para Tomar Determinaciones sobre la Gestión de Llanuras de Inundación y la Protección de Humedales. La actividad se financia bajo el Programa de Mitigación (MIT) de Subvención Comunitaria para el Desarrollo Comunitario (CDBG), subvención HUD Número 24-065-091-E767. El(los) proyecto(s) propuesto(s) se encuentra en 6541 Greenwood Drive en Corpus Christi, condado de Nueces, Texas, y se encuentra en la llanura de inundación de la Norma Federal de Gestión del Riesgo de Inundaciones (FFRMS). La extensión de la llanura de inundación FFRMS se determinó mediante un enfoque de valor de francobordo.

El proyecto consiste en mitigar posibles daños por inundación en la actual Planta de Tratamiento de Aguas Wastewater de Greenwood (WWTP). El proyecto se está llevando a cabo para permitir que la planta mantenga la integridad del proceso de tratamiento durante eventos meteorológicos extremos como huracanes y tormentas tropicales. El proyecto se encuentra en la llanura de inundación del FFRMS y partes de las mejoras de mitigación de inundaciones estarán en un canal de inundación. Aproximadamente una hectárea de la llanura de inundación se verá afectada temporalmente, con aproximadamente 0,1 acres de impactos en la zona de desagüe.

La ciudad de Corpus Christi ha considerado las siguientes alternativas y medidas de mitigación para minimizar los impactos adversos y restaurar y preservar las funciones naturales y beneficiosas y los valores intrínsecos de la llanura de inundación/humedal existente: El proyecto debe llevarse a cabo en la llanura de inundación porque las unidades de tratamiento de PMB existentes se encuentran dentro de la llanura de inundación. La ciudad de Corpus Christi consideró que el proyecto se está llevando a cabo en una WWTP existente, que presta servicio a 64,336 personas. Las opciones consideradas incluyen la Opción A, "Mitigación de inundaciones y generadores de respaldo de la WWTP de Greenwood", y la Opción B, "Alternativa sin acción": Bajo la Opción A, "Mitigación de inundaciones y generadores de respaldo de la PMB de Greenwood", la ciudad de Corpus Christi completaría el proyecto para mitigar posibles daños por inundación en la PMB de Greenwood y permitir que la planta mantenga la integridad del proceso de tratamiento durante eventos meteorológicos extremos como huracanes y tormentas tropicales. Bajo esta opción, se proponen medidas de mitigación para proteger aquellas estructuras más susceptibles a inundaciones dentro de la planta, junto con mejoras en el sistema de drenaje interior y mejoras en el nivelamiento para recoger las aguas pluviales de las zonas críticas dentro de la planta que son propensas a acumularse en y alrededor de las instalaciones de la planta. Las mejoras principales incluyen el nivelamiento del terreno, la tuberías y la mejora de la vía de desagüe; muros de inundación para estructuras vegetales identificadas; una nueva estación de bombeo de efluentes (EPS) de capacidad firme de hasta 36 MGD; y mejoras varias. El proyecto también incluye tareas que no se realizarán en la llanura de inundación, como la instalación de generadores de emergencia, la instalación de instrumentación y un sistema de control eléctrico para la conmutación automática entre la energía de la red y los generadores de emergencia, así como mejoras diversas relacionadas con generadores de emergencia. Bajo la "Alternativa de No Acción", la ciudad de Corpus Christi no completó las mejoras de mitigación de inundaciones en la WWTP de Greenwood. La "Alternativa Sin Acción" no fue seleccionada porque la WWTP seguiría sufriendo inundaciones y podría afectar la calidad del agua por desbordamientos

de alcantarillado sanitario. Las mejoras en la mitigación de inundaciones cumplirán con el Código de Prevención de Riesgos de Inundación de la ciudad de Corpus Christi.

La ciudad de Corpus Christi ha reevaluado alternativas a la construcción en la llanura de inundación del FFRMS y ha determinado que no existe una alternativa viable al desarrollo de la llanura de inundación. Los archivos medioambientales que documentan el cumplimiento de la Orden Ejecutiva 11988 están disponibles para inspección pública, revisión y copia previa solicitud, en los horarios y lugares indicados en el último párrafo de este aviso para la recepción de comentarios.

Este aviso tiene tres propósitos principales. En primer lugar, las personas que puedan verse afectadas por actividades en la llanura de inundación del FFRMS y aquellas que tengan interés en la protección del medio ambiente natural deberían tener la oportunidad de expresar sus preocupaciones y proporcionar información sobre estas áreas. En segundo lugar, un programa adecuado de aviso público puede ser una herramienta educativa importante para el público en general. La difusión de información y la solicitud de comentarios públicos sobre las llanuras de inundación del FFRMS pueden facilitar y reforzar los esfuerzos federales para reducir los riesgos e impactos asociados a la ocupación y modificación de estas áreas especiales. Tercero, por equidad, cuando el gobierno federal determine que participará en acciones que se lleven a cabo en las llanuras de inundación del FFRMS, debe informar a quienes puedan estar en mayor o continuo riesgo.

Los comentarios escritos deben ser recibidos por la Ciudad de Corpus Christi en la siguiente dirección a fecha del 24 de febrero de 2026 o antes:

City of Corpus Christi
Mayor's Office
P.O. Box 9277, Corpus Christi, TX 78469
(361) 826-3100
Attn: Paulette Guajardo, Mayor

También puede revisarse una descripción completa del proyecto de 8:00 a.m. a 5:00 p.m. en 1201 Leopard Street, Corpus Christi, TX 78401 y en <https://www.corpuschristitx.gov/department-directory/corpus-christi-water/cdbq-mitigation-funded-projects/>. Los comentarios también pueden enviarse por correo electrónico en Paulette.Guajardo@CorpusChristi.TX.gov.

Fecha: 16 de febrero de 2026



City of Corpus Christi



CCW Home

[\(/department-directory/corpus-christi-water/\)](#)

Drought Stage 3

[\(https://stage3.cctexas.com/\)](https://stage3.cctexas.com/)

Pay Your Utility Bill

[\(/department-directory/corpus-christi-water/pay-your-bill-new-service/\)](#)

Water Supply Dashboard

[\(/department-directory/corpus-christi-water/water-supply-dashboard-english/\)](#)

Water Conservation

[\(/department-directory/corpus-christi-water/water-conservation/\)](#)

CDBG-Mitigation Funded Projects

Section Menu

The General Land Office (GLO) awarded a contract to the City of Corpus Christi under the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant Mitigation (CDBG-MIT) program to provide financial assistance with funds appropriated to facilitate activities related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, mitigation, and affirmatively furthering fair housing, in accordance with Executive Order 12892, in the most impacted and distressed areas resulting from a major declared disaster that occurred in 2015, 2016, or 2017. The grant total is \$15,092,700.

The City of Corpus Christi will perform the projects identified below to increase resilience to reduce or eliminate long-term risk of disaster-related loss of life, injury, damage to and loss of property, and hardship by lessening the impact of future disasters.



Greenwood Wastewater Treatment Plant

Project Title: Greenwood WWTP Flood Mitigation and Generator Improvements

Location: 6541 Greenwood, Corpus Christi, TX

Grant Award: \$8,432,420

Description: The project will improve site grade, paving, flooding way, and influent lift station and access; install effluent pump station; install generator and controls; and complete associated appurtenances.

Oso Wastewater Treatment Plant

Project Title: Oso WWTP Generator Improvements

Location: 501 Nile Drive, Corpus Christi, TX

Grant Award: \$6,660,280

Description: The project will install a generator and complete associated appurtenances.

Information

Click on the links provided below to view additional information.

Community Development Plans and Reports (</department-directory/planning-economic-development/community-development/plans-and-reports/>)

Civil Rights Public Notice (English) (</media/4pwpo5v3/civil-rights-public-notice-english-1.pdf>)

Civil Rights Public Notice (Spanish) (</media/4lih1gfx/civil-rights-public-notice-spanish.pdf>)

Early Floodplain Public Notice (English) (</media/v14iktyd/early-floodplain-public-notice-english.pdf>)

Early Floodplain Public Notice (Spanish) (</media/2vvmv01z/early-floodplain-public-notice-spanish.pdf>)

Final Floodplain Public Notice (English) (</media/z1vhbh43/final-floodplain-public-notice-english-signed-02-16-2026.pdf>)

Final Floodplain Public Notice (Spanish) (</media/zwblwutf/final-floodplain-public-notice-spanish-signed-02-16-2026.pdf>)

Department Directory (</department-directory/>)

Corpus Christi Water (</department-directory/corpus-christi-water/>)

Toggle Section

Corpus Christi Water (</department-directory/corpus-christi-water/>)

Toggle Section

Attachment J –

Programmatic Agreement between THC and TGLO



**AMENDMENT NO. 1 TO
GLO CONTRACT NO. 19-127-000-B465**

THE GENERAL LAND OFFICE (the “GLO”) and **TEXAS HISTORICAL COMMISSION** (“THC”), each a “Party” and collectively “the Parties” to GLO Contract No. 19-127-000-B465 (the “Agreement”), desire to amend the Agreement.

WHEREAS, the Parties desire to amend the Agreement to reflect all GLO Programs that are subject to the terms of the Agreement; and

WHEREAS, the Parties desire to revise or replace certain language in the Agreement to clarify and accurately reflect the Parties’ respective responsibilities under the Agreement; and

WHEREAS, the Parties desire to extend the term of the Agreement; and

WHEREAS, the GLO will send a copy of this executed amendment to the ACHP;

NOW, THEREFORE, in accordance with Article XII of the Agreement, the Parties agree as follows:

1. The first three recitals of the Agreement are deleted in their entirety and replaced with the following:

“**WHEREAS**, the GLO administers the U.S. Department of Housing and Urban Development (“HUD”) Community Development Block Grant – Disaster Recovery (“CDBG-DR”) and Community Development Block Grant – Mitigation (“CDBG-MIT”) programs (collectively, the “Program”) to provide financial assistance with funds appropriated by the Congress of the United States to facilitate disaster recovery, disaster relief, long-term recovery, restoration, economic revitalization, and mitigation and to affirmatively further fair housing, in accordance with Executive Order 12892, in areas which are Presidentially-declared major disaster areas under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5121 et seq.); and

WHEREAS, the GLO, in consultation with the THC, has determined that activities funded under the Program may have an effect on a CDBG-MIT-served or CDBG-DR-served historic property’s eligibility to be included in the National Register and the GLO must consult with the State Historic Preservation Officer (“SHPO”) for Texas, pursuant to Section 106 of the NHPA (herein, a “Section 106 Review”); and

WHEREAS, the GLO has determined that certain routine Program activities, listed in Attachment A, attached hereto and incorporated herein for all purposes, will have no effect on a CDBG-MIT-served or CDBG-DR-served historic property’s eligibility to be included in the National Register, and should be excluded from a Section 106 Review; and”

2. **ARTICLE III (B)** of the Agreement is deleted in its entirety and replaced with the following:

“(B) For all CDBG-DR and CDBG-MIT program submissions, an expedited review process of fourteen (14) calendar days upon receipt of complete documentation by SHPO will be in effect. This expedited review process shall only cover reviews submitted pursuant to **ARTICLES V and VI**, using the THC’s online eTRAC (electronic THC Review and Compliance) system, accessible at <https://www.thc.texas.gov/etrac-system>. For properties listed in or eligible for the NRHP, the THC may contact the GLO within the fourteen (14) day period to indicate that up to thirty (30) calendar days are required for the response. Additionally, for Undertakings where a report involving fieldwork is submitted, THC staff archeologists shall be allowed the full thirty (30) day period to review and comment.”

3. **ARTICLE IV (C)** of the Agreement is deleted in its entirety and replaced with the following:

“(C) **For cumulative effects:** For the purposes of this document and paraphrasing the National Environmental Policy Act definition (40 CFR § 1508.7), cumulative effects on historic properties are the effects that result from the incremental impact of the Undertaking when added to other past, present and reasonably foreseeable future Undertakings regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time. GLO and THC shall notify the other Party if potential NRHP-eligible historic or archaeological districts are identified through consultation with interested parties during the course of program activities. Each potential district shall be evaluated for formal inclusion in CDBG-DR program evaluations as a historic district using criteria defined by the National Park Service in National Register Bulletin 15.”

4. **ARTICLE V (A) (3)** of the Agreement is deleted in its entirety and replaced with the following:

“(3) If an architectural property is at least forty-five (45) years of age, is not listed in the National Register, and has not been evaluated for National Register eligibility, the Responsible Entity shall submit documentation to the SHPO for review per **ARTICLE V (A) (5)** of this Agreement. The forty-five-year age limit was selected to ensure historic age resources were captured in the event of unforeseen potential Undertaking delays and to afford flexibility to account for potential inaccuracies in building dates. The Parties agree that prefabricated manufactured homes do not constitute an architectural property type of concern and do not need to be submitted to THC for historic property review regardless of age if this origin is confirmed by a SOI-qualified architectural historian.”

5. **ARTICLE VI (A) (1)** of the Agreement is deleted in its entirety and replaced with the following:

“(1) For Undertakings that involve new ground disturbance and are not listed as an Exempt activity under Attachment A, the Responsible Entity shall coordinate with the SHPO to determine whether archeological investigations are warranted. Documentation to aid in this determination may be provided by the Responsible Entity as outlined in **ARTICLE V (A) (5) (a)-(c)**, above. Documentation shall include, at minimum: the address (including city and county); a U.S. Geological Survey 7.5 minute quadrangle map with the property location and boundary shown; documentation establishing

whether the property is owned or controlled by a public agency; an Undertaking description noting impacts that will occur to the ground surface and the depth of the impact; and documentation of any extenuating circumstances that may be important for review, such as evidence of severe erosion or previous construction within the Undertaking area.”

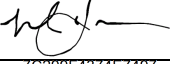
6. **ARTICLE XIV** of the Agreement is amended to reflect a termination date of **October 9, 2028**.
7. **ATTACHMENT A** to the Agreement, **List of Exempt Activities**, is deleted in its entirety and replaced with the **Revised List of Exempt Activities**, attached hereto and incorporated herein in its entirety for all purposes as **ATTACHMENT A-1**.
8. This Amendment shall be effective upon the date of the last signature.
9. The terms and conditions of the Agreement not amended herein shall remain in force and effect.

SIGNATURE PAGE FOLLOWS


**SIGNATURE PAGE FOR AMENDMENT NO. 1 TO
GLO CONTRACT No. 19-127-000-B465**

GENERAL LAND OFFICE

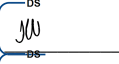

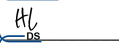

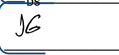
TEXAS HISTORICAL COMMISSION

DocuSigned by:

7C299F4374E7497...

Mark A. Havens, Chief Clerk/
Deputy Land Commissioner
Date of execution: 4/4/2023

DocuSigned by:

01632F3C4E7946A...

Name: Mark wolfe
Title: Executive Director
Date of execution: 4/4/2023

- OGC 
- PM 
- SDD 
- DGC 
- GC 

ATTACHED TO THIS AMENDMENT:

ATTACHMENT A-1 – Revised List of Exempt Activities

LIST OF EXEMPT ACTIVITIES

The GLO, in consultation with the THC, has determined that the following activities do not meet the definition of an Undertaking since they either: (1) do not have the potential to cause effects on historic properties per 36 CFR § 800.4(d)(1); or (2) have limited potential to affect historic properties per 36 CFR § 800.5 and will have no adverse effect if carried out as described. The activities in this list require no further review under the terms of this Agreement. The GLO and Responsible Entities shall maintain a list of Undertakings completed per these exemptions and shall make the list available upon the request of the THC and include the updated list in the annual report.

GENERAL ACTIVITIES (Categorically Excluded under 24 CFR § 58.34)

- A. Environmental and other studies, resource identification, and the development of plans and strategies. (Implementation of such plans with federal funds may require consultation. If historic properties may be affected, SHPO recommends early consultation during planning stages.)
- B. Information and financial services.
- C. Administrative and management activities.
- D. Public services that will not have a physical impact or result in any physical changes to buildings, structures, sites, or objects, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation, and welfare or recreational needs.
- E. Inspections and testing of properties for hazards or defects. (Action taken pursuant to such inspections with federal funds will require consultation.)
- F. Purchase of insurance (e.g. homeowners or flood insurance; does not include HUD mortgage insurance).
- G. Purchase of tools.
- H. Engineering or design costs. (Construction activities undertaken with federal funds will require consultation. If historic properties may be affected, SHPO recommends early consultation during design.)
- I. Technical assistance and training.
- J. Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration.
- K. Payment of principal and interest on loans made or obligations guaranteed by HUD;

REHABILITATION OF BUILDINGS

Interior Rehabilitation:

Undertakings limited to interior spaces of single- or multifamily residential buildings to be retained in the same use where the work will not be visible from the exterior of the building; no structural alterations are made; no demolition of walls, ceilings, or floors occurs; no drop ceilings are added; and no walls are leveled with furring or moved.

The following list of activities that do not need consultation with the SHPO provides further clarity for residential work and establishes standards for civic, commercial, and other property types.

A. Disaster recovery measures:

1. Temporary repair to single-family residential buildings to ensure safe shelter with access to essential electrical supply, HVAC, hot water, natural gas and potable water, and protection from elements such as weatherproofing and securing broken doors and windows.
2. Interior repairs to pre-disaster condition of single- or multifamily residential buildings, excluding structural repairs (e.g. foundation, framing), or other elements requiring architectural or engineering services.

B. Heating, ventilation, and air conditioning (HVAC):

1. Installing mechanical equipment in residential buildings in a manner that does not affect the exterior of the building.
2. Installing mechanical equipment in other building types within existing mechanical closets, chases, and unfinished attics or basements when ducts are not visible within occupied spaces of the building and access to the ducts does not require demolition of walls or ceilings in occupied spaces of the building.
3. Routine maintenance or retrofits to existing mechanical equipment, provided there is no physical impact on the building.
4. Replacement of existing mechanical equipment or installation of supplemental equipment, provided that exterior equipment is installed within the same footprint on the same pad, and interior equipment is installed within an existing mechanical closet or unoccupied attic or basement.
5. Upgrading existing facility and infrastructure-related pumps and motors, including those for HVAC systems, to variable-speed or premium efficiency standards.
6. Sealing, restoring, or insulating HVAC ducts, provided that the ducts are not visible in occupied spaces of the building and access to the ducts does not require demolition of walls or ceilings in occupied spaces of the building.
7. Adding or replacing existing building controls systems including HVAC control systems and the replacement of building-wide pneumatic controls with digital controls, thermostats, dampers, and other individual sensors like smoke detectors or carbon monoxide detectors (wired or non-wired).

C. Lighting and appliances:

1. Installation of fire, smoke, or carbon monoxide detectors.
2. Installation of compact fluorescent or LED bulbs in existing fixtures.
3. Replacement of fluorescent bulbs, ballasts, and/or wiring in existing fixtures.
4. Replacement of existing fluorescent fixtures with new fixtures, provided that the fixtures are not original to the building.
5. Installation of motion/occupancy sensors for lighting control.
6. Replacement of existing lighting in street lighting fixtures with high efficiency lighting.

7. Replacement of existing appliances.

D. Insulation:

1. Attic insulation with proper ventilation, provided that insulation is fiberglass batt or loose fill only (not spray foam).
2. Under-floor insulation in basements or crawl spaces, provided that insulation is fiberglass batt or loose fill only (not spray foam), and ventilation of crawl spaces.
3. Exterior blown-in wall insulation (not spray foam) where holes are not drilled through exterior wall material or decorative plasterwork on the interior and result in no permanent visible alteration to the structure.
4. Water heater tank and pipe insulation.
5. Radiant barriers in unoccupied attic spaces.

E. Plumbing:

1. Repairing plumbing systems in a manner that does not affect the interior or exterior of the building.
2. Water heater repair or replacement that does not require a visible new supply or venting.
3. Restroom improvements for handicapped access, provided the work is contained within the existing restroom.
4. Water conservation measures, such as installation of low-flow faucets, toilets, showerheads, urinals, or distribution device controls, in residential properties; and water conservation measures in other building types, provided that plumbing fixtures to be replaced are not original to the building.
5. Upgrading existing facility and infrastructure-related pumps and motors, including those for water/wastewater facilities, to variable-speed or premium efficiency standards.

F. Electrical:

Repairing or upgrading electrical systems in a manner that does not affect the interior or exterior of the building.

Exterior Rehabilitation:

A. Roofing:

1. In-kind replacement of existing roofing material.
2. Replacement of existing gutters and downspouts.
3. Installation of continuous ridge vents covered with ridge shingles or boards, or roof jacks/vents, bath and kitchen fan vents, gable vents, soffit and frieze board vents, and combustion appliance flues, if not located on a primary roof elevation or visible from the public right-of-way.
4. Installation of reflective roof coatings, with materials that closely match the historic materials and form, or with materials that restore the original feature based on historic evidence, and in a manner that does not alter the roofline.

5. Installation of new roofing or reflective roof coatings on a flat-roofed building with a parapet, such that the roofing material is not visible from any public right-of-way.
6. Replacement of asbestos tile roofing with composition shingle/asphalt shingle roofing matching the shape and pattern of the asbestos tile.

B. Siding, soffits, fascia, and masonry:

1. Repair or limited, in-kind replacement of existing siding, soffits, and fascia. Limited replacement shall not exceed 25% of the overall exterior area, and new material shall match existing in material, profile, and other characteristics.
2. Limited repair of masonry, including chimneys, where mortar matches the existing in color, texture, strength, joint width, and joint profile and methods are consistent with the preservation techniques in *Preservation Brief #2; Repointing Mortar Joints in Historic Masonry Buildings*. Limited repair shall not exceed 10% of the overall exterior wall area.

C. Painting:

1. Painting previously painted exterior surfaces, provided destructive surface preparation treatments, including but not limited to water-blasting, sandblasting and chemical removal, are not used.
2. Conducting lead-based paint abatement or interim controls pursuant to 24 CFR § 35.115(a)(13), if carried out by a qualified contractor using current best practices and methods that are consistent with the preservation techniques in *Preservation Brief #37: Appropriate Methods for Reducing Lead-Paint Hazards in Historic Housing*. (Any removal of historic building materials or encapsulation with vinyl siding or other materials is not included in this exemption.)

D. Windows and doors:

1. Weatherstripping around windows and doors, installing thresholds, and other air infiltration control measures that do not harm or obscure historic windows, doors, or trim.
2. Caulking around windows and doors, provided that the color of the sealant matches adjacent materials.
3. Installing interior storm windows or doors, or exterior storm or wood screen doors, on residential buildings, in a manner that does not harm or obscure historic windows or trim.
4. Repair or repainting of existing storm windows.
5. Installing removable film on windows (if the film is transparent), solar screens, or window louvers, on residential buildings, in a manner that does not harm or obscure historic windows or trim.
6. Repair or replacement of missing or damaged window glass.
7. Repair of windows using in-kind materials.
8. Replacement of non-historic exterior doors with compatible wood panel doors.

E. Porches:

1. Repair (not replacement) of porch ceilings, steps, floors, or railings.

2. Repair of existing wheelchair ramps.
3. Installing a new wheelchair ramp on the side or rear entrance of a home, when not visible from any public right-of-way.
4. Installing a new wheelchair ramp on the front of a home, or other entrance visible from a public right-of-way, in a manner that does not remove, compromise, or damage existing historic materials or features and would be completely reversible without damage to historic fabric.

F. Ground-disturbing activity and site work:

1. Repairing or replacing in-kind existing driveways, parking areas, and walkways with materials of similar appearance in a manner that does not disturb historic landscape materials or features.
2. Excavating to gain access to existing underground utilities to repair or replace them, in a manner that does not disturb historic exterior building or landscape materials or features, and where all construction occurs within existing trenches.
3. Repair or replacement of metal utilitarian structures (e.g. pump houses, storage buildings) less than 45 years old, when performed in previously disturbed soils.
4. Ground disturbance that is minimal and occurs in documented, previously disturbed soil.

G. Elevation: Elevation of pier-and-beam, wood frame structures four feet or less if the front entrance stair configuration is unaltered. Foundation skirting and piers shall be extended or replaced with in-kind materials; brick or stucco piers with lattice or board and batten skirting is preferred in instances where historic materials are no longer present. This exemption does not apply to buildings with other structural systems, such as masonry construction or slab-on-grade foundations.

H. Generators: Installation of generators at existing facilities, where:

1. Ground-level equipment is located to the rear or side of the building or is otherwise screened from view from any public right-of-way, and any new equipment slabs and trenching occurs within previously disturbed soils.
2. Roof-mounted equipment is not visible from the ground level.

SINGLE-FAMILY HOUSING

- A. For single-family residential CDBG-DR or CDBG-MIT programs that involve new ground disturbance, archeological review by THC is not required if the Responsible Entity's SOI-qualified archaeologist verifies and documents that no known archaeological sites, archaeological districts, or natural water features (including wetlands) are located within 100 meters of the parcel boundary.
- B. The Louisiana-Rio Grande Canal Company Irrigation System is a collection of very large NRHP-listed historic districts within the Lower Rio Grande Valley, defined by local historic events and engineering design. Archeological review by THC is not required if project ground disturbances will occur more than 100 meters from an irrigation district canal or engineering feature, unless it is in proximity to a recorded archeological site or natural water feature, as noted Paragraph A, above.

INFRASTRUCTURE

The following projects may be exempt from review when they occur 25 feet or greater from the fence line or boundary of a cemetery, or where no work will occur within 15 feet of a cemetery. Projects which involve work within 15 feet of a cemetery must be submitted in accordance with **ARTICLE VI, ARCHEOLOGICAL REVIEW**, and will require archeological studies to verify whether or not there are any unmarked graves beyond the marked cemetery boundary. These studies may include scrapings or informant interviews with the manager of the cemetery association, local historians, funeral home directors, or other informed individuals.

- A. Routine road maintenance and resurfacing where work is confined to the existing right-of-way and previously maintained surfaces, ditches, culverts, and cut and fill slopes where there are no known historic properties, or historic properties would not be affected because the proposed work is clearly within a disturbed context. This exemption shall not apply in areas with brick streets or with tile curb markers or other decorative street features.
- B. Point repair to an existing water or wastewater line where construction occurs in the original trench
- C. Replacement of existing water or wastewater lines where all construction occurs within the original trench.
- D. Replacement of existing water or wastewater lines in a new trench paralleling the existing line if the following conditions are met:
 1. Replacement occurs beneath city streets or adjacent drainage rights-of-way (as in item A);
 2. Replacement does not occur within a National Register historic district or locally designated historic district;
 3. Replacement does not occur within the historic towns of Goliad, San Augustine, Jefferson, Nacogdoches, Bastrop, Castroville, San Ygnacio, Roma, Refugio, Ysleta, San Elizario, and Presidio;
 4. Replacement does not occur beneath brick-paved streets; and
 5. Replacement does not occur adjacent to roads in rural areas of the county (where abandoned cemeteries or unrecorded archeological sites might be impacted by a new trench).
- E. Minor alterations or additions to existing water or wastewater treatment plants or other facilities that are less than 45 years old. (Excavation of new treatment ponds or enlargement of existing ponds are not considered minor alterations and are subject to review).
- F. Installation of generators at existing water/wastewater or shelter facilities, where:
 1. Ground-level equipment is located to the rear or side of the building or is otherwise screened from view from any public right-of-way, and any new equipment slabs and trenching occurs within previously disturbed soils.
 2. Roof-mounted equipment is not visible from the ground level.
- G. Addition or replacement of equipment within the same location and footprint (Examples include but not limited to; Computer monitoring equipment, bar screens, clarifiers, chlorination equipment, SCADA equipment etc.).
- H. Repair of bridges less than 45 years old.



ORIGINAL PROGRAMMATIC AGREEMENT



**PROGRAMMATIC AGREEMENT
BETWEEN THE TEXAS HISTORICAL COMMISSION
AND
THE TEXAS GENERAL LAND OFFICE
GLO CONTRACT NO. 19-127-000-B465**

The **TEXAS GENERAL LAND OFFICE** (“GLO”) and the **TEXAS HISTORICAL COMMISSION** (“THC”), agencies of the State of Texas (each a “Party” and, collectively, the “Parties”), hereby enter into this Programmatic Agreement (the “Agreement”) concerning projects (each, an “Undertaking”) possibly affecting properties eligible for inclusion in the National Register of Historic Places (“National Register”), pursuant to Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108 (“NHPA”), and its implementing regulations at 36 C.F.R. Part 800; and

WHEREAS, the GLO administers the U.S. Department of Housing and Urban Development (“HUD”) Community Development Block Grant Disaster Recovery (“CDBG-DR”) programs (collectively, the “Program”) to provide financial assistance with funds appropriated by the Congress of the United States to facilitate disaster recovery, restoration, economic revitalization, and to affirmatively further fair housing, in accordance with Executive Order 12892, in areas which are Presidentially-declared major disaster areas under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5121 *et seq.*); and

WHEREAS, the GLO, in consultation with the THC, has determined that activities funded under the Program may have an effect on a CDBG-DR-served historic property’s eligibility to be included in the National Register and the GLO must consult with the State Historic Preservation Officer (“SHPO”) for Texas, pursuant to Section 106 of the NHPA (herein, a “Section 106 Review”); and

WHEREAS, the GLO has determined that certain routine Program activities, listed in **Attachment A**, attached hereto and incorporated herein for all purposes, will have no effect on a CDBG-DR-served historic property’s eligibility to be included in the National Register, and should be excluded from a Section 106 Review; and

WHEREAS, 24 C.F.R. Part 58 allows State, tribal, and local governments to assume HUD’s environmental review responsibilities as a “Responsible Entity,” including obligations under Section 106 of the NHPA and its implementing regulations at 36 C.F.R. Part 800; and

WHEREAS, certain subrecipients selected by the GLO may be designated as a Responsible Entity participating in the Program and will be required to comply with 24 C.F.R. Part 58, 36 C.F.R. Part 800, and any other applicable statutes and rules, and will further be required to fulfill the GLO’s roles, responsibilities, and terms of this Agreement and any amendments hereto; and

WHEREAS, in accordance with 24 C.F.R. Part 58, in instances in which a subrecipient lacks the capacity to act as a Responsible Entity, the GLO is designated the Responsible Entity; and

WHEREAS, the NHPA has implemented regulations at 36 C.F.R. § 800.14(b) to allow for the use of programmatic agreements for the efficient administration of the Section 106 Review process; and

WHEREAS, the GLO and the THC, as the SHPO for the State of Texas, agree that it is in the best interest of the State to streamline the Section 106 Review process through the use of this Agreement; and

WHEREAS, the GLO has invited the Advisory Council on Historic Preservation (ACHP) to determine whether the ACHP wishes to enter into consultation on this agreement and the ACHP has chosen not to participate in consultation.

NOW, THEREFORE, the GLO and the THC agree that this Program shall be administered in accordance with the following terms and conditions in satisfaction of NHPA requirements:

ARTICLE I – EXEMPTIONS FROM REVIEW

A. The Responsible Entity shall, within a reasonable time and with good faith effort, evaluate each historic-age property to determine the potential for effects. Activities not requiring SHPO review (“Exempt Activities”), listed in **Attachment A**, attached hereto and incorporated herein for all purposes, are determined by the Parties to not have the potential to cause effects on historic properties per 36 C.F.R. § 800.4(d)(1) or have limited potential to affect historic properties per 36 C.F.R. § 800.5, with no adverse effect if carried out as described. The Responsible Entity is not required to consult with the SHPO regarding Exempt Activities. The Responsible Entity shall keep documentation of its determination of exempt status on file and available for periodic review by the SHPO and shall include this information in annual reports prepared per **ARTICLE IX** below.

B. The GLO and the SHPO may add or remove activities from **Attachment A** by written amendment to this Agreement per **ARTICLE XII**.

ARTICLE II - RESPONSIBILITIES OF THE RESPONSIBLE ENTITY

The Parties have determined that activities not listed in **Attachment A** may have the potential to have an effect on a historic property and require review pursuant to this **ARTICLE II** and **ARTICLES III** through **VIII**, below. The Responsible Entity shall ensure that the following measures are carried out:

A. General Requirements of the Responsible Entity. For each Undertaking contemplated under this Agreement, the Responsible Entity shall consult with, and submit documentation for review to, the SHPO and other consulting parties, including, but not limited to, federally recognized Indian Tribes/Tribal Historic Preservation Officers (THPOs); representatives or local governments; and applicants for Federal assistance, permits, licenses, and other approvals, for the following:

1. Establish whether the Undertaking has the potential to affect historic properties (36 C.F.R. § 800.3(a), (c), and (d));

2. Identify the consulting parties who should be invited to participate in the Undertaking (36 C.F.R. § 800.3);
3. Seek public comment for individual Undertakings, and conduct public involvement activities (36 C.F.R. § 800.3(e));
4. Determine and document the scope of identification efforts and level of effort through the internal review and screening process of the Undertaking, including the Area of Potential Effect (APE) of the Undertaking (36 C.F.R. § 800.4(a) and (b));
5. Identify historic-age properties located within the Undertaking APE (36 C.F.R. § 800.4) and evaluate the National Register eligibility of each;
6. Apply the Criteria of Adverse Effect on historic properties to determine whether the properties may be affected by the Undertaking (36 C.F.R. § 800.5(a)(1));
7. Initiate consultation on the resolution of adverse effects with appropriate consulting parties (36 C.F.R. § 800.6);
8. Consult, as appropriate, regarding the determination of the Undertaking APE, the evaluation of National Register eligibility, and the effects of a Program Undertaking on historic properties;
9. Coordinate Section 106 Review with other relevant Undertaking reviews; and
10. Document individual Undertakings and maintain a record of all Undertaking reviews carried out pursuant to this Agreement.

B. Compliance. The Responsible Entity shall comply, and ensure each subrecipient's compliance through subrecipient agreements, if any, with the terms of this Agreement for all applicable Undertakings that are funded entirely or in part by monies from the Program. For purposes of this Agreement, the GLO and each self-performing GLO subrecipient are hereafter referred to, collectively, as the "Responsible Entity," except in instances where either such entity is named individually.

C. Professional Qualifications Standards. The Responsible Entity shall ensure that all actions prescribed in this Agreement involving the identification, evaluation, assessment of effects, treatment, monitoring, or disposition of historic properties, or involving the reporting or documentation of such actions, shall be carried out by or under the direct supervision of a person or persons meeting the Secretary of the Interior's ("SOI") Professional Qualifications Standards (48 Fed. Reg. 44738, September 29, 1983; http://www.nps.gov/history/local-law/arch_stnds_9.htm) in the fields of History, Archeology, Architectural History, or other applicable discipline, as appropriate based on the nature of the Undertaking, for the identification of historic properties and assessment of effects. Completion of mitigation under **ARTICLE V(D)** of this Agreement shall be performed or overseen by appropriately qualified professionals.

D. Public Participation. The Responsible Entity shall arrange, in a manner consistent with 36 C.F.R. § 800.8(c), for public participation appropriate to the scope of the programs covered by this Agreement in consideration of the nature of the activities undertaken in the Program and the likely

effects on historic properties. The Responsible Entity shall make appropriate efforts, in accordance with HUD regulations governing the Program, to involve the interested individuals, organizations, and entities.

E. Completion Required. The Section 106 Review required under this Agreement must be resolved before the Responsible Entity's final approval of any Undertaking application; before an irrevocable commitment to an Undertaking by the Responsible Entity; and before the Responsible Entity or the property owner alters a historic property.

ARTICLE III – RESPONSIBILITIES OF THE SHPO

A. Unless otherwise provided for in **ARTICLE III(B)** or **ARTICLE VII**, the SHPO shall review and comment on Responsible Entity-submitted documentation concerning an Undertaking within thirty (30) calendar days of receipt. If any Responsible Entity-submitted documentation is determined to be inadequate, the SHPO shall respond within thirty (30) days of receipt, and any supplemental documentation will be reviewed within thirty (30) days of its receipt by the SHPO. If the SHPO does not provide comments within the appropriate time period established herein for its response, the Responsible Entity may assume the SHPO concurs with its determination and may proceed with the Undertaking in accordance with all other terms of this Agreement.

B. For state-run program submissions, an expedited review process of fourteen (14) calendar days upon receipt of complete documentation by SHPO will be in effect. This expedited review process shall only cover reviews submitted pursuant to **ARTICLE V**, using the THC's online eTRAC (electronic THC Review and Compliance) system, accessible at <http://www.thc.texas.gov/etrac-system>. For properties listed in or eligible for the NRHP, the THC may contact the GLO within the fourteen (14) day period to indicate that up to thirty (30) calendar days are required for the response. Additionally, Undertakings requiring input from SHPO staff archeologists under **ARTICLE VI** will be allowed the full thirty (30) day period.

C. The SHPO response to a request for comment will include:

1. a statement of concurrence or non-concurrence with the Responsible Entity's findings and recommendations; and/or
2. any comments related to effects findings.

ARTICLE IV – AREA OF POTENTIAL EFFECTS

The Responsible Entity shall consult with the SHPO to determine and document the Area of Potential Effects ("APE"), as defined in 36 C.F.R. § 800.16(d), for an Undertaking, as follows:

- (A) **For direct effects:** The APE shall include the footprint to be directly affected by new construction, staging areas, and access areas, with regard to the identification of archeological sites. For the rehabilitation of any building without associated new construction or additions, the APE shall consist solely of the building being rehabilitated.
- (B) **For indirect effects:** A broader APE will be required to assess Undertakings that have the potential for visual or other indirect effects on nearby architectural properties, herein defined as non-archeological historic properties, including any significant structures and/or

landscape features located on the properties. Indirect effects may change the character of the property's use or physical features within the property's setting that contribute to its historic significance; are often audible, atmospheric, and visual effects; and may relate to viewshed issues.

- (C) **For cumulative effects:** For the purposes of this document and paraphrasing the National Environmental Policy Act definition (40 CFR § 1508.7), cumulative effects on historic properties are the effects that result from the incremental impact of the Undertaking when added to other past, present and reasonably foreseeable future Undertakings regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.

ARTICLE V – ARCHITECTURAL REVIEW

(A) **Identification and Evaluation of Historic Properties.**

The Responsible Entity shall make a reasonable and good faith effort to identify historic properties located within the APE, as follows:

- (1) For Undertakings involving ground disturbance, the Responsible Entity shall coordinate with the SHPO to determine whether archeological background research and/or a field survey is warranted pursuant to **ARTICLE VI, ARCHEOLOGICAL REVIEW**. In making this determination, all parties shall reference HUD's HP Factsheet 6 (http://portal.hud.gov/hudportal/documents/huddoc?id=env_factsheet_6.pdf) and the ACHP's Policy Statement on Affordable Housing and Historic Preservation, Implementation Principle VIII (<http://www.achp.gov/docs/fr7387.pdf>).
- (2) For Undertakings with the potential for direct or visual effects to architectural properties, the Responsible Entity shall determine if properties within the APE are individually listed in the National Register, within the boundaries of a National Register historic district, or previously determined to be eligible for inclusion in the National Register. The Responsible Entity may reference the Texas Historic Sites Atlas at <http://atlas.thc.state.tx.us> to determine if a property already has historical designations, and may rely on previous coordination with SHPO for eligibility determinations. Properties listed or eligible for listing in the National Register shall require coordination with the SHPO per **ARTICLE V** of this Agreement.
- (3) If an architectural property is at least forty-five (45) years of age, is not listed in the National Register, and has not been evaluated for National Register eligibility, the Responsible Entity shall submit documentation to the SHPO for review per **ARTICLE V(A)(5)** of this Agreement. The forty-five-year age limit was selected to ensure historic age resources were captured in the event of unforeseen potential Undertaking delays and to afford flexibility to account for potential inaccuracies in building dates.
- (4) If the Responsible Entity determines that an Undertaking application involves an architectural property constructed fewer than forty-five (45) years ago, or a property

at least forty-five (45) years of age that has been determined ineligible for the National Register within the past five (5) years, and the property is not within the boundaries of a National Register-listed or -eligible historic district, no further coordination with SHPO shall be required for that property. The Responsible Entity shall keep documentation of this determination on file and available for periodic review by the SHPO per **ARTICLE IX** of this Agreement.

- (5) The Responsible Entity shall submit documentation of each architectural property requiring Section 106 Review to the SHPO for consultation. Documentation may be provided:
 - (a) Through the THC's online eTRAC system, accessible at <http://www.thc.texas.gov/etrac-system>;
 - (b) By using a "Request for SHPO Consultation" form, submitted in hard copy by mail or delivery service, or
 - (c) In a cover letter, with attachments including required information, submitted in hard copy by mail or delivery service.

Documentation should include, at a minimum, the address of the subject property (including city and county), a map showing the property location, the known or estimated date of construction, a brief architectural description, history of the property and names of architects or builders, if known, and current, clear overall photographs of the property. The submittal should indicate whether the property is listed in the National Register, if known, or determine whether it is eligible for listing in the National Register. Upon review, the SHPO shall concur or disagree with the eligibility determination provided within thirty (30) days.

- (6) If a property within the APE is determined eligible for National Register listing, further coordination shall be required per **ARTICLE V (B)**. If all properties within the APE are determined not eligible for the National Register and are not within a National Register-eligible historic district, and no historic properties are affected by the Undertaking, the Section 106 Review process is complete and no further coordination with the SHPO shall be required for the Undertaking.
- (7) Disputes regarding determinations of eligibility shall be referred by the Responsible Entity, through the GLO, to the Keeper of the National Register in accordance with 36 CFR § 800.4(c)(2) and 36 CFR § 63.2.

(B) Assessment of Adverse Effect

The Responsible Entity shall make a reasonable and good faith effort to assess adverse effects on historic properties within the APE, as follows:

- (1) For properties listed in, or determined eligible for, the National Register, the Responsible Entity shall submit to the SHPO documentation of any proposed activities that do not fall within the exclusions listed in **Attachment A**. Documentation may be provided as outlined in **ARTICLE V(A)(5)(a)-(c)**, above, and

shall include a scope of work, plans and specifications, or other detailed description of the Undertaking. Photographs of the areas in which work is to be performed shall be included. The Responsible Entity shall assess whether the Undertaking would have an adverse effect on the historic property per 36 C.F.R. § 800.5 and the SHPO shall concur or disagree with the determination.

- (2) Upon concurrence of the Parties that an Undertaking is designed and planned in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* (36 C.F.R. § 68, hereinafter, the "Applicable Standards"), or the Undertaking otherwise does not meet the criteria to create an adverse effect, the Undertaking shall be considered to have no adverse effect, and no further coordination with the SHPO will be required for the Undertaking.
- (3) The Responsible Entity and the SHPO shall make best efforts to expedite reviews through a finding of "no adverse effect with conditions" when the scope of work can be modified to ensure adherence with the Applicable Standards. If the Undertaking cannot meet the Applicable Standards or otherwise would result in an adverse effect to historic properties, the Responsible Entity shall proceed with further consultation.

(C) **Resolution of Adverse Effect**

The Responsible Entity shall make a reasonable and good faith effort to resolve adverse effects on historic properties located within the APE. To resolve adverse effects, the Responsible Entity shall consult with the SHPO, any consulting parties, and the public, as appropriate, to seek alternatives to avoid, minimize, or mitigate the effect of the Undertaking per 36 C.F.R. § 800.6. To document alternatives considered in the planning process, Undertaking Applicants should provide written justification for the proposed action that will cause an adverse effect, summarize and provide documentation of alternatives to the action, and cite the specific reasons why the proposed action was selected over other alternatives. Consultation to resolve adverse effects shall result in the issuance of a Memorandum of Agreement ("MOA") per 36 C.F.R. § 800.6(c), or where appropriate, the Responsible Entity or the SHPO may propose the use of standard mitigation measures per **ARTICLE V(D)**.

(D) **Standard Mitigation Measures.**

In instances which the Responsible Entity, in consultation with the SHPO and other consulting parties, if any, determines one or more Undertakings will cause adverse effects to multiple historic properties, in lieu of negotiating separate MOAs for specific Undertakings, the Responsible Entity may use the standard mitigation measures described below in their entirety or as part of a broader mitigation plan. The use of standard mitigation measures and the specific scope of the mitigation measures shall be agreed upon by a letter exchange between the Responsible Entity and the SHPO, which the letter(s) shall become a part of the Responsible Entity's files.

(1) **Historic American Building Survey ("HABS") Documentation**

- (a) The Responsible Entity shall be responsible for performing archival-quality documentation of a historic property affected by the Undertaking. The

documentation shall meet the Secretary of the Interior's *Standards and Guidelines for Architectural and Engineering Documentation: HABS/HAER Standards* and National Park Service (“NPS”) guidance documents, including the May 2010 transmittal guidelines *Preparing HABS/HAER/HALS Documentation; Historic American Buildings Survey Guidelines for Historical Reports*; December 2008 *HABS Guidelines; Recording Historic Structures and Sites with HABS Measured Drawings*; and June 2001 *HABS/HAER Photographs Specifications and Guidelines*; or the latest guidance from NPS at <http://www.nps.gov/history/hdp/standards/index.htm>.

- (b) The level of documentation shall be determined in consultation with the SHPO and NPS Intermountain Regional Office, and may be one of the following three (3) options:

Level I: measured drawings, large-format photography, and written history and description; or

Level II: existing drawings, large format photography, and written history and description; or

Level III: sketch plan, large format photography, and architectural data form.

- (c) The Responsible Entity shall submit the completed HABS documentation to the SHPO and NPS for review and approval. Within thirty (30) days of receipt, the SHPO shall advise the Responsible Entity if the submitted documentation is satisfactory or shall request specific revisions. The NPS may also request specific revisions to meet HABS standards. If any HABS documentation is determined to be inadequate, the SHPO shall respond within thirty (30) days of receipt, and any supplemental documentation will be reviewed within thirty (30) days of its receipt by the SHPO and NPS. Upon acceptance of the documentation by the SHPO and NPS, the Undertaking may proceed.
- (d) The Responsible Entity may also submit the complete documentation package to a local or regional archival repository or library, selected in consultation with the SHPO, in addition to, or in lieu of, review by NPS for inclusion in the HABS/HAER collection at the Library of Congress, if the SHPO agrees this alternative is acceptable. In such a case, the Undertaking may proceed following acceptance of the documentation by the SHPO and its receipt at the selected repository.

(2) **Digital Photographic Documentation**

- (a) The Responsible Entity shall be responsible for digitally photographing each historic property affected by an Undertaking or Undertakings conducted under this Agreement. Photography shall comply with the requirements of the NPS's *National Register Photograph Policy Factsheet* (<http://www.nps.gov/nr/publications/bulletins/photopolicy/index.htm>), or

the latest guidance from NPS, with regard to image size and format of digital files, photograph log, and permanence requirements for prints. The number and type of views shall be determined in consultation with the SHPO.

- (b) The Responsible Entity shall submit to the SHPO electronic media containing the digital images, and a photo log for review and approval. Within thirty (30) days of receipt, the SHPO shall advise the Responsible Entity if the submitted documentation is satisfactory or shall request specific revisions. If revisions are requested, the SHPO shall specify whether the revised documentation is to be submitted to SHPO for a second thirty (30)-day review. Upon acceptance of the documentation by the SHPO, the Undertaking may proceed.
- (c) The Responsible Entity shall also provide the complete documentation package to an appropriate archival repository or library, as determined in consultation with the SHPO.

(3) National Register of Historic Places Nomination

- (a) The Responsible Entity shall be responsible for developing a National Register of Historic Places nomination in keeping with the guidance provided in NPS's *National Register Bulletin #16A: How to Complete the National Register Nomination Form* and other applicable bulletins (<http://www.nps.gov/history/nr/publications>). The nomination shall include a historic context, architectural descriptions, photographs, and maps, as required to fully document the historic property or district.
- (b) The Responsible Entity shall submit one (1) electronic media file containing the completed nomination form and attachments for review and approval to the SHPO via the Electronic THC Review And Compliance System (eTRAC) (<http://www.thc.texas.gov/etrac-system>). Within sixty (60) days of receipt, the SHPO shall advise the Responsible Entity if the submitted nomination is satisfactory or shall request specific revisions. If revisions are requested, the SHPO shall specify whether the revised documentation is to be submitted to the SHPO for a second sixty (60)-day review. Upon acceptance of the nomination by the SHPO, the Undertaking may proceed.
- (c) The Responsible Entity shall not be responsible for carrying the nomination form forward for consideration by the State Board of Review and NPS, or for any subsequent revisions required by those bodies.

(4) Historic Context Development

- (a) The Responsible Entity shall develop a historic context related to the historic property affected and selected in consultation with the SHPO. All work shall be done in accordance with the guidance on developing historic contexts in the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (http://www.cr.nps.gov/local-law/arch_stnds_5.htm). The historic context shall include a methodology identifying archival

resources used and a bibliography for future research efforts.

- (b) The Responsible Entity shall submit one (1) electronic media file of the completed historic context for review and approval to the SHPO via the eTRAC system (<http://www.thc.texas.gov/etrac-system>). Within sixty (60) days of receipt, the SHPO shall advise the Responsible Entity if the submitted documentation is satisfactory or shall request specific revisions. If revisions are requested, the SHPO shall specify whether any revised documentation is to be submitted to the SHPO for a second sixty (60)-day review. Upon acceptance of the documentation by the SHPO, the Undertaking may proceed.
- (c) The Responsible Entity shall also provide the completed historic context to an appropriate archival repository or library, as determined in consultation with the SHPO.

(5) **Historic Property Inventory**

- (a) The Responsible Entity shall work with the SHPO to establish the appropriate level of effort to accomplish a historic property inventory. Efforts may be directed toward the resurvey of previously designated historic properties and/or districts which have undergone change or lack sufficient documentation, or the survey of new historic properties and/or districts that lack formal designation. Once the boundaries of the survey area have been agreed upon, the Responsible Entity shall continue to coordinate with the SHPO through the data collection process. The Responsible Entity shall use SHPO standards for the survey of historic properties and SHPO forms as appropriate.
- (b) The Responsible Entity shall prepare a draft inventory report, according to SHPO templates and guidelines. The Responsible Entity shall submit one (1) hard copy of the completed inventory and one (1) portable data storage device containing a digital file of the inventory to the SHPO for review and approval. Within sixty (60) days of receipt, the SHPO shall advise the Responsible Entity if the submitted documentation is satisfactory or shall request specific revisions, including whether any revised documentation is to be submitted to the SHPO for a second sixty (60)-day review. Upon acceptance of the documentation by the SHPO, the Undertaking may proceed.

- (6) **Public Interpretation.** Prior to implementation of the Undertaking, the Responsible Entity shall work with the SHPO to design an educational interpretive plan. The plan may include signs, displays, educational pamphlets, websites, workshops, and other similar mechanisms to educate the public on historic properties within the local community, state, or region. The Responsible Entity and SHPO shall continue to consult throughout implementation of the plan until all agreed upon actions have been completed.

(7) **Design Review for Infill Construction**

- (a) Prior to initiating the construction of a new building within a historic district or adjacent to historic properties, the Responsible Entity shall submit architectural and site plans for the proposed building to the SHPO for review and comment. For larger or complex new construction, the Responsible Entity shall establish a schedule for submittal of plans to the SHPO during plan development (e.g., 30%, 60%, and 90% construction documents) to allow for early and ongoing review. Within thirty (30) days of receipt of submitted architectural drawings, the SHPO shall provide recommendations to make the new construction compatible with the architectural character of nearby historic properties. The Responsible Entity shall consider any SHPO comments and make a reasonable and good faith effort to incorporate the SHPO's suggestions into the final architectural and site plans.
- (b) The Responsible Entity shall make reasonable attempts to use building setbacks, exterior materials, and overall building forms that are compatible with nearby historic properties.

ARTICLE VI – ARCHEOLOGICAL REVIEW

(A) **Identification and Evaluation of Historic Properties**

- (1) For Undertakings involving ground disturbance, the Responsible Entity shall coordinate with the SHPO to determine whether archeological investigations are warranted. Documentation to aid in this determination may be provided by the Responsible Entity as outlined in **ARTICLE V(A)(5)(a)-(c)**, above. Documentation shall include, at minimum: the address (including city and county); a U.S. Geological Survey 7.5 minute quadrangle map with the property location and boundary shown; documentation establishing whether the property is owned or controlled by a public agency; an Undertaking description noting impacts that will occur to the ground surface and the depth of the impact; and documentation of any extenuating circumstances that may be important for review, such as evidence of severe erosion or previous construction within the Undertaking area.
- (2) In determining whether archeological background research and/or field survey is warranted, all parties shall reference HUD's HP Factsheet 6 at: (http://portal.hud.gov/hudportal/documents/huddoc?id=env_factsheet_6.pdf) and ACHP's Policy Statement on Affordable Housing and Historic Preservation, Implementation Principle VIII (<http://www.achp.gov/docs/fr7387.pdf>).
- (3) At the request of the SHPO, the Responsible Entity shall make a reasonable and good faith effort to identify archeological properties within the APE. Pursuant to 36 CFR § 800.4(b)(1), the steps to fulfill this requirement may include, but are not limited to, background research, including review of the THC's Texas Archeological Sites Atlas, consultation, oral history interviews, sample field investigations, and reconnaissance or intensive field survey. All investigators will conform to the THC's *Archeological Survey Standards of Texas* (http://www.thc.texas.gov/public/upload/publications/THC_SurveyStandards_2014_0.pdf) and the Secretary of the Interior's

Standards and Guidelines for Archeology and Historic Preservation.

- (4) In accordance with Texas Natural Resources Code, Title 9, § 191.054, an Antiquities Permit may be issued by the THC to allow survey and discovery or excavation of archeological sites for Undertakings under any land within the jurisdiction of the State of Texas, such as property owned by a state agency or political subdivision of the state (cities, counties, river authorities, municipal utility districts, and school districts).
 - (5) A draft report of the investigations conducted per **ARTICLE VI(A)(3)**, above, should be produced in conformance with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* and the Council of Texas Archeologists' *Guidelines for Cultural Resource Management Reports* (<http://www.thc.texas.gov/public/upload/CTAguidelines.pdf>), and submitted to the SHPO for review. The Responsible Entity shall receive a redacted version of the same archeological report for review and comment from qualified archeologists. Should the Responsible Entity employ a qualified archeologist, then unredacted versions may be submitted to the Responsible Entity. Comments received from the SHPO shall be addressed in the final reports. If no cultural resources are identified in the APE and the SHPO concurs, no further coordination with the SHPO will be required for the Undertaking.
 - (6) If cultural resources are identified within the APE, the Responsible Entity shall consult with the SHPO to develop a testing plan to determine eligibility for inclusion in the National Register, in accordance with the process described in 36 CFR § 800.4(c) and criteria established in 36 C.F.R. § 60.4. Alternatively, the Undertaking applicant may redesign the Undertaking to avoid completely all effects on the identified cultural resources. All draft reports of site testing shall be submitted to the SHPO for review and comment. Comments received from the SHPO shall be addressed in the final reports.
 - (7) If the Responsible Entity and the SHPO agree as to whether a property is eligible for inclusion in the National Register, such agreement is deemed conclusive for the purposes of this Agreement. Disputes regarding determinations of eligibility shall be referred by the Responsible Entity, through the GLO, to the Keeper of the National Register in accordance with 36 CFR § 800.4(c)(2). Cultural resources determined to be ineligible for the National Register shall require no further protection.
 - (8) During implementation of this Agreement, the Responsible Entity will protect information about historic properties, including location information or information provided by Indian tribes to assist in the identification of such properties, to the extent allowable under Section 304 of the National Historic Preservation Act, 54 U.S.C. § 306108, 36 CFR § 800.11(c), and in accordance with the Texas Natural Resources Code Title 9, § 191.021.
- (B) Assessment of Adverse Effect**

For archeological sites determined eligible for the National Register, the Responsible Entity

shall submit documentation to the SHPO of any proposed activities that do not fall within the exclusions of **Attachment A**. Documentation shall include an Undertaking description noting impacts that will occur to the ground surface and the depth of the impact. The Responsible Entity should assess whether the Undertaking would have an adverse effect on the historic property. If an adverse effect determination is made, the SHPO shall concur or disagree with the determination. If no determination is reached by the Responsible Entity, the SHPO shall determine whether the work meets the Criteria of Adverse Effect in 26 C.F.R. § 800.5. If the Responsible Entity and the SHPO concur that the Undertaking will have no adverse effect on historic properties, no further coordination with the SHPO shall be required for the Undertaking.

(C) **Resolution of Adverse Effect**

- (1) If the Responsible Entity and the SHPO determine that an Undertaking will have an adverse effect on a historic property, the Responsible Entity shall consult with the SHPO, tribes, consulting parties, and the public, as appropriate, to seek alternatives that would avoid, minimize, or mitigate the effect of the Undertaking per 36 CFR § 800.6.
- (2) The Responsible Entity shall prepare a data recovery plan (the “Plan”) that describes mitigation measures proposed to resolve the Undertaking’s adverse effects and provide the Plan for review and comment to all consulting parties. All parties shall have thirty (30) calendar days in which to provide a written response to the Responsible Entity. The Plan may include, as appropriate, a research design; excavation or recordation strategies; work and report schedules; site monitoring; and relocation, preservation, or reburial; and curation of artifacts and records. It shall take into account all research and previous work conducted and specify, at a minimum: a) the historic property where data recovery is to be conducted (this information shall be removed in the redacted version of the report); b) the excavation or recordation that will be performed under the approved Plan; c) the methods to be used, with an explanation of their relevance to the Undertaking research design; and d) the methods to be used in analysis, data management, and dissemination of data, including a schedule of work and report submission.
- (3) When adverse effects to historic properties cannot be avoided, the Responsible Entity, in consultation with the SHPO and any consulting parties, shall develop a plan to mitigate the adverse effects. If the SHPO approves the plan for mitigating the adverse effects, the Responsible Entity shall implement the plan. Upon completion of the approved mitigation methods, the adverse effect shall be considered resolved.
- (4) If the Responsible Entity and the SHPO fail to agree on an adverse effect resolution, consultation shall proceed in accordance with 36 C.F.R. § 800.7 and **ARTICLE XI**.

ARTICLE VII – EMERGENCY SITUATIONS

- (A) When the Responsible Entity or other local government official determines that a historic property is an imminent threat to public health or safety as a result of a natural or man-made disaster or emergency declared by the President or Governor, the Responsible Entity shall

notify the SHPO of the determination as soon as possible under the circumstances and provide all pertinent historic property information and a proposed plan of action for SHPO review.

- (B) If the SHPO objects to the proposed emergency action within seven (7) days, the Responsible Entity shall comply with all applicable non-emergency terms of this Agreement.
- (C) This Article applies only to Undertakings that will be implemented within thirty (30) days after a federal or state disaster or emergency has been formally declared, as stipulated in 36 C.F.R. § 800.12(d), unless such disaster or emergency declaration is extended by written proclamation prior to expiration of the initial thirty (30)-day period.
- (D) Immediate rescue, repair, stabilization, and salvage operations conducted to preserve life or property are exempt from the provisions of this Agreement, with the exception that the Responsible Entity shall provide documentation of the action to the SHPO within thirty (30) days of the action. Where possible, emergency actions shall be undertaken in a manner that does not foreclose future preservation or restoration of affected historic properties.

ARTICLE VIII—POST-REVIEW DISCOVERIES AND UNFORESEEN EFFECTS

- (A) If, during the implementation of an Undertaking, a previously unidentified historic property is encountered, or a known historic property may be affected in an unanticipated manner, the Responsible Entity will assume its responsibilities under 36 CFR § 800.13(b), "Post-Review Discoveries: Discoveries without Prior Planning." The Responsible Entity will stop construction activities in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the property until the Responsible Entity concludes consultation with the SHPO.
- (B) The Responsible Entity will notify the SHPO of the discovery at the earliest possible time and consult to develop actions to take into account the effects of the Undertaking. The Responsible Entity will notify the SHPO of any time constraints, and all parties shall mutually agree upon timeframes for this consultation. The Undertaking Applicant may participate in this consultation. The Responsible Entity will provide the SHPO with complete documentation on the change in the Undertaking, potential effects, and written recommendations, to take into account the effects of the Undertaking.
- (C) When the discovery contains burial sites or human remains, the Responsible Entity shall follow the post-review discovery procedures of 36 C.F.R. § 800.13 and applicable requirements of the Texas Health and Safety Code, Title 1, Chapter 711, and treat said sites and/or remains in a manner consistent with the provisions of ACHP's *Policy Statement Regarding Treatment of Burial Sites, Human Remains, or Funerary Objects* (February 23, 2007). Work shall immediately cease within a fifty (50) foot radius of the area of discovery.
- (D) If the SHPO does not object to the Responsible Entity's recommendations within the agreed upon timeframe, as developed pursuant to Section (B) above, the Responsible Entity will modify the scope of work to implement the recommendations. If the SHPO objects to the recommendations, the Responsible Entity and the SHPO will consult further to resolve the objection through actions including, without limitation, identifying Undertaking alternatives that result in the Undertaking having no adverse effect on historic properties, or

proceeding in accordance with **ARTICLES IV** through **VI**.

ARTICLE IX – MONITORING AND REPORTING

The SHPO may monitor activities carried out pursuant to this Agreement and shall review activities if requested by any interested party or person. The Responsible Entity shall cooperate with the SHPO in carrying out these monitoring responsibilities.

The Responsible Entity shall provide the SHPO with an annual report on activities carried out each fiscal year under the terms of this Agreement. The reports shall be due on September 1 of each year the Agreement is in effect. Each report shall include:

- (A) A list of all Undertakings that were exempt from review under **ARTICLE I**, including the address of each property, brief description of the work performed, and the exemption type from **Attachment A**; and
- (B) The status of any mitigation prepared pursuant to **ARTICLE V(D)** or **ARTICLE VI(C)**.

ARTICLE X – ANTICIPATORY DEMOLITION

The GLO shall not issue a grant a loan, loan guarantee, or other financial assistance to a subrecipient that has intentionally allowed or failed to prevent, in instances which the subrecipient has the authority to prevent, an adverse effect to an historic property. However, the GLO may determine, after consultation with the ACHP, that circumstances justify granting such assistance despite the adverse effect created or permitted by the subrecipient and will complete consultation for the Undertaking pursuant to the terms of this Agreement.

ARTICLE XI – DISPUTE RESOLUTION

Should a Party to this Agreement or a consulting party, including a subrecipient, object at any time to any actions proposed or the manner in which the terms of this Agreement are implemented, the GLO shall consult with the objecting party to resolve the objection. If the GLO determines within thirty (30) days of receipt of an objection that such objection cannot be resolved, the dispute will be addressed as follows:

- (A) The GLO will forward all documentation relevant to the dispute, including the GLO's proposed resolution, to the ACHP in accordance with 36 CFR § 800.2(b)(2).
- (B) The ACHP shall provide the GLO with its advice on the resolution of the objection within thirty (30) days of receipt of adequate documentation; whereupon, the GLO shall prepare a written final response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories, and consulting parties, and provide copies of this written response to the objecting party, the ACHP, signatories, and consulting parties.
- (C) If the ACHP does not provide its advice regarding the dispute within thirty (30) days of the receipt of the GLO's proposed resolution, the GLO may make a final decision regarding the dispute and proceed accordingly. The GLO shall prepare a written response that takes into

account any timely comments regarding the dispute from signatories and consulting parties and provide copies of this written response to the objecting party, the ACHP, signatories, and consulting parties.

The Parties' responsibilities to carry out all other actions subject to the terms of this Agreement that are not the subject of the dispute remain unchanged.

ARTICLE XII – AMENDMENTS

Amendments to this Agreement shall be by written agreement between the GLO and the THC. Subrecipients will be notified of any amendment to this Agreement via a Technical Guidance Letter issued under a subrecipient agreement. A copy of the amendment will be filed with the ACHP.

ARTICLE XIII – TERMINATION

A Party may terminate the Agreement upon thirty (30) days' written notification to the other. In the event of termination, the GLO will follow the procedure outlined in 36 CFR Part 800, Subpart B, "The Section 106 Process," with respect to Undertakings that had been covered by this Agreement.

ARTICLE XIV – TERM OF AGREEMENT

This Agreement shall be effective as of the date executed by the last party and will terminate five (5) years after its effective date. At any time during the term of this Agreement, the GLO and THC may extend the Agreement in accordance with ARTICLE XII. Unless a Responsible Entity terminates the Agreement earlier in accordance with ARTICLE XIII, the termination under this Article shall be effective for all Parties.

ARTICLE XV – ADDITIONAL PARTIES

Governmental bodies that are eligible to be Responsible Entities are required to comply with the terms of this Agreement as a condition of their participation in the Program. Except for ARTICLES XI, XII, and XIV, Responsible Entities other than the GLO will assume all roles, responsibilities, and terms ascribed to the GLO hereunder.

No assistance or approval for Program activities will be made by a Responsible Entity until it has approved the outcome of consultation with the THC and other consulting parties, if any. If the Responsible Entity does not approve the outcome of consultation for a specific Undertaking, then additional information, performance of additional consultations, or direct consultation with the SHPO and other parties may be required to complete the Section 106 Review process.

SIGNATURE PAGE FOLLOWS

SIGNATURE PAGE FOR GLO CONTRACT NO. 19-127-000-B465

Execution and implementation of this Agreement is evidence that the GLO has afforded the ACHP an opportunity to comment on these programs and that the GLO has taken into account the effects of the programs on historic properties.

GENERAL LAND OFFICE

DocuSigned by:



Mark A. Havens, Chief Clerk/
Deputy Land Commissioner

Date of execution: 10/9/2018

OGC ^{DS} gm

DD ^{DS} [Signature]

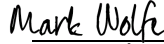
SDD ^{DS} PP

DGC ^{DS} MB

GC ^{DS} JG

TEXAS HISTORICAL COMMISSION

DocuSigned by:



By: Mark Wolfe
Title: Executive Director

Date of execution: 10/8/2018

ATTACHMENTS TO THIS AGREEMENT:

ATTACHMENT A – LIST OF EXEMPT ACTIVITIES

ATTACHMENT FOLLOWS

LIST OF EXEMPT ACTIVITIES

The GLO, in consultation with the THC, has determined that the following activities do not meet the definition of an Undertaking since they either: (1) do not have the potential to cause effects on historic properties per 36 CFR § 800.4(d)(1); or (2) have limited potential to affect historic properties per 36 CFR § 800.5 and will have no adverse effect if carried out as described. The activities in this list require no further review under the terms of this Agreement. The GLO and Responsible Entities shall maintain a list of Undertakings completed per these exemptions and shall make the list available upon the request of the THC and include the updated list in the annual report.

GENERAL ACTIVITIES (Categorically Excluded under 24 CFR § 58.34)

- A. Environmental and other studies, resource identification, and the development of plans and strategies. (Implementation of such plans with federal funds may require consultation. If historic properties may be affected, SHPO recommends early consultation during planning stages.)
- B. Information and financial services.
- C. Administrative and management activities.
- D. Public services that will not have a physical impact or result in any physical changes to buildings, structures, sites, or objects, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation, and welfare or recreational needs.
- E. Inspections and testing of properties for hazards or defects. (Action taken pursuant to such inspections with federal funds will require consultation.)
- F. Purchase of insurance (e.g. homeowners or flood insurance; does not include HUD mortgage insurance).
- G. Purchase of tools.
- H. Engineering or design costs. (Construction activities undertaken with federal funds will require consultation. If historic properties may be affected, SHPO recommends early consultation during design.)
- I. Technical assistance and training.
- J. Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration.
- K. Payment of principal and interest on loans made or obligations guaranteed by HUD;
- L. Any categorical exclusion listed in 24 C.F.R. § 58.35(a) provided that there are no circumstances which require compliance with any other Federal laws and authorities cited in 24 C.F.R. § 58.5.

REHABILITATION OF BUILDINGS

Interior Rehabilitation:

Undertakings limited to interior spaces of single- or multifamily residential buildings to be retained

in the same use where the work will not be visible from the exterior of the building; no structural alterations are made; no demolition of walls, ceilings, or floors occurs; no drop ceilings are added; and no walls are leveled with furring or moved.

The following list of activities that do not need consultation with the SHPO provides further clarity for residential work and establishes standards for civic, commercial, and other property types.

A. Disaster recovery measures:

1. Temporary repair to single-family residential buildings to ensure safe shelter with access to essential electrical supply, HVAC, hot water, natural gas and potable water, and protection from elements such as weatherproofing and securing broken doors and windows.
2. Interior repairs to pre-disaster condition of single- or multifamily residential buildings, excluding structural repairs (e.g. foundation, framing), or other elements requiring architectural or engineering services.

B. Heating, ventilation, and air conditioning (HVAC):

1. Installing mechanical equipment in residential buildings in a manner that does not affect the exterior of the building.
2. Installing mechanical equipment in other building types within existing mechanical closets, chases, and unfinished attics or basements when ducts are not visible within occupied spaces of the building and access to the ducts does not require demolition of walls or ceilings in occupied spaces of the building.
3. Routine maintenance or retrofits to existing mechanical equipment, provided there is no physical impact on the building.
4. Replacement of existing mechanical equipment or installation of supplemental equipment, provided that exterior equipment is installed within the same footprint on the same pad, and interior equipment is installed within an existing mechanical closet or unoccupied attic or basement.
5. Upgrading existing facility and infrastructure-related pumps and motors, including those for HVAC systems, to variable-speed or premium efficiency standards.
6. Sealing, restoring, or insulating HVAC ducts, provided that the ducts are not visible in occupied spaces of the building and access to the ducts does not require demolition of walls or ceilings in occupied spaces of the building.
7. Adding or replacing existing building controls systems including HVAC control systems and the replacement of building-wide pneumatic controls with digital controls, thermostats, dampers, and other individual sensors like smoke detectors or carbon monoxide detectors (wired or non-wired).

C. Lighting and appliances:

1. Installation of fire, smoke, or carbon monoxide detectors.
2. Installation of compact fluorescent or LED bulbs in existing fixtures.
3. Replacement of fluorescent bulbs, ballasts, and/or wiring in existing fixtures.

4. Replacement of existing fluorescent fixtures with new fixtures, provided that the fixtures are not original to the building.
5. Installation of motion/occupancy sensors for lighting control.
6. Replacement of existing lighting in street lighting fixtures with high efficiency lighting.
7. Replacement of existing appliances.

D. Insulation:

1. Attic insulation with proper ventilation, provided that insulation is fiberglass batt or loose fill only (not spray foam).
2. Under-floor insulation in basements or crawl spaces, provided that insulation is fiberglass batt or loose fill only (not spray foam), and ventilation of crawl spaces.
3. Exterior blown-in wall insulation (not spray foam) where holes are not drilled through exterior wall material or decorative plasterwork on the interior and result in no permanent visible alteration to the structure.
4. Water heater tank and pipe insulation.
5. Radiant barriers in unoccupied attic spaces.

E. Plumbing:

1. Repairing plumbing systems in a manner that does not affect the interior or exterior of the building.
2. Water heater repair or replacement that does not require a visible new supply or venting.
3. Restroom improvements for handicapped access, provided the work is contained within the existing restroom.
4. Water conservation measures, such as installation of low-flow faucets, toilets, showerheads, urinals, or distribution device controls, in residential properties; and water conservation measures in other building types, provided that plumbing fixtures to be replaced are not original to the building.
5. Upgrading existing facility and infrastructure-related pumps and motors, including those for water/wastewater facilities, to variable-speed or premium efficiency standards.

F. Electrical:

Repairing or upgrading electrical systems in a manner that does not affect the interior or exterior of the building.

Exterior Rehabilitation:

A. Roofing:

1. In-kind replacement of existing roofing material.
2. Replacement of existing gutters and downspouts.
3. Installation of continuous ridge vents covered with ridge shingles or boards, or roof jacks/vents, bath and kitchen fan vents, gable vents, soffit and frieze board vents, and

combustion appliance flues, if not located on a primary roof elevation or visible from the public right-of-way.

4. Installation of reflective roof coatings, with materials that closely match the historic materials and form, or with materials that restore the original feature based on historic evidence, and in a manner that does not alter the roofline.
5. Installation of new roofing or reflective roof coatings on a flat-roofed building with a parapet, such that the roofing material is not visible from any public right-of-way.
6. Replacement of asbestos tile roofing with composition shingle/asphalt shingle roofing matching the shape and pattern of the asbestos tile.

B. Siding, soffits, fascia, and masonry:

1. Repair or limited, in-kind replacement of existing siding, soffits, and fascia. Limited replacement shall not exceed 25% of the overall exterior area, and new material shall match existing in material, profile, and other characteristics.
2. Limited repair of masonry, including chimneys, where mortar matches the existing in color, texture, strength, joint width, and joint profile and methods are consistent with the preservation techniques in *Preservation Brief #2; Repointing Mortar Joints in Historic Masonry Buildings*. Limited repair shall not exceed 10% of the overall exterior wall area.

C. Painting:

1. Painting previously painted exterior surfaces, provided destructive surface preparation treatments, including but not limited to water-blasting, sandblasting and chemical removal, are not used.
2. Conducting lead-based paint abatement or interim controls pursuant to 24 CFR § 35.115(a)(13), if carried out by a qualified contractor using current best practices and methods that are consistent with the preservation techniques in *Preservation Brief #37: Appropriate Methods for Reducing Lead-Paint Hazards in Historic Housing*. (Any removal of historic building materials or encapsulation with vinyl siding or other materials is not included in this exemption.)

D. Windows and doors:

1. Weatherstripping around windows and doors, installing thresholds, and other air infiltration control measures that do not harm or obscure historic windows, doors, or trim.
2. Caulking around windows and doors, provided that the color of the sealant matches adjacent materials.
3. Installing interior storm windows or doors, or exterior storm or wood screen doors, on residential buildings, in a manner that does not harm or obscure historic windows or trim.
4. Repair or repainting of existing storm windows.
5. Installing removable film on windows (if the film is transparent), solar screens, or window louvers, on residential buildings, in a manner that does not harm or obscure historic windows or trim.
6. Repair or replacement of missing or damaged window glass.
7. Repair of windows using in-kind materials.

8. Replacement of non-historic exterior doors with compatible wood panel doors.

E. Porches:

1. Repair (not replacement) of porch ceilings, steps, floors, or railings.
2. Repair of existing wheelchair ramps.
3. Installing a new wheelchair ramp on the side or rear entrance of a home, when not visible from any public right-of-way.
4. Installing a new wheelchair ramp on the front of a home, or other entrance visible from a public right-of-way, in a manner that does not remove, compromise, or damage existing historic materials or features and would be completely reversible without damage to historic fabric.

F. Ground-disturbing activity and site work:

1. Repairing or replacing in-kind existing driveways, parking areas, and walkways with materials of similar appearance in a manner that does not disturb historic landscape materials or features.
2. Excavating to gain access to existing underground utilities to repair or replace them, in a manner that does not disturb historic exterior building or landscape materials or features, and where all construction occurs within existing trenches.
3. Repair or replacement of metal utilitarian structures (e.g. pump houses, storage buildings) less than 45 years old, when performed in previously disturbed soils.
4. Ground disturbance that is minimal and occurs in documented, previously disturbed soil.

G. Elevation: Elevation of pier-and-beam, wood frame structures four feet or less if the front entrance stair configuration is unaltered. Foundation skirting and piers shall be extended or replaced with in-kind materials; brick or stucco piers with lattice or board and batten skirting is preferred in instances where historic materials are no longer present. This exemption does not apply to buildings with other structural systems, such as masonry construction or slab-on-grade foundations.

H. Generators: Installation of generators at existing facilities, where:

1. Ground-level equipment is located to the rear or side of the building or is otherwise screened from view from any public right-of-way, and any new equipment slabs and trenching occurs within previously disturbed soils.
2. Roof-mounted equipment is not visible from the ground level.

INFRASTRUCTURE

The following projects may be exempt from review when they occur 25 feet or greater from the fence line or boundary of a cemetery, or where no work will occur within 15 feet of a cemetery. Projects which involve work within 15 feet of a cemetery must be submitted in accordance with **ARTICLE VI, ARCHEOLOGICAL REVIEW**, and will require archeological studies to verify whether or not there are any unmarked graves beyond the marked cemetery boundary. These studies may include scrapings or informant interviews with the manager of the cemetery association, local

historians, funeral home directors, or other informed individuals.

- A. Routine road maintenance and resurfacing where work is confined to the existing right-of-way and previously maintained surfaces, ditches, culverts, and cut and fill slopes where there are no known historic properties, or historic properties would not be affected because the proposed work is clearly within a disturbed context. This exemption shall not apply in areas with brick streets or with tile curb markers or other decorative street features.
- B. Point repair to an existing water or wastewater line where construction occurs in the original trench
- C. Replacement of existing water or wastewater lines where all construction occurs within the original trench.
- D. Replacement of existing water or wastewater lines in a new trench paralleling the existing line if the following conditions are met:
 - 1. Replacement occurs beneath city streets or adjacent drainage rights-of-way (as in item A);
 - 2. Replacement does not occur within a National Register historic district or locally designated historic district;
 - 3. Replacement does not occur within the historic towns of Goliad, San Augustine, Jefferson, Nacogdoches, Bastrop, Castroville, San Ygnacio, Roma, Refugio, Ysleta, San Elizario, and Presidio;
 - 4. Replacement does not occur beneath brick-paved streets; and
 - 5. Replacement does not occur adjacent to roads in rural areas of the county (where abandoned cemeteries or unrecorded archeological sites might be impacted by a new trench).
- E. Minor alterations or additions to existing water or wastewater treatment plants or other facilities that are less than 45 years old. (Excavation of new treatment ponds or enlargement of existing ponds are not considered minor alterations and are subject to review).
- F. Installation of generators at existing water/wastewater or shelter facilities, where:
 - 1. Ground-level equipment is located to the rear or side of the building or is otherwise screened from view from any public right-of-way, and any new equipment slabs and trenching occurs within previously disturbed soils.
 - 2. Roof-mounted equipment is not visible from the ground level.
- G. Addition or replacement of equipment within the same location and footprint (Examples include but not limited to; Computer monitoring equipment, bar screens, clarifiers, chlorination equipment, SCADA equipment etc.).
- H. Repair of bridges less than 45 years old.

**Attachment K –
Tribal Consultation Correspondence**



CITY OF CORPUS CHRISTI
OFFICE OF THE MAYOR
PAULETTE M. GUAJARDO

February 16, 2026

Durell Cooper, Chairman
Apache Tribe of Oklahoma
511 East Colorado Drive
Anadarko, OK 73005

Re: Greenwood WWTP Flood Mitigation & Backup Generator, 6541 Greenwood Drive,
Corpus Christi, TX 78417
HUD CDBG-MIT Grant Number 24-065-091-E767

Dear Chairman Cooper,

The City of Corpus Christi is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City of Corpus Christi has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings and structures with significant tribal association.

The City of Corpus Christi will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR Part 800. We would like to invite you to be a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

The City of Corpus Christi is proposing to mitigate potential flood damages and install emergency generators and associated instrumentation and electrical control systems at the existing Greenwood Wastewater Treatment Plant to allow the plant to maintain integrity of the treatment process during extreme weather events. The State Historic Preservation Officer (SHPO), the Texas Historical Commission (THC), was not consulted because a programmatic agreement exists between THC and the HUD program administrator, the Texas General Land Office (GLO). The programmatic agreement states that activities, such as installation of generators at existing facilities and minor

alterations or additions to existing wastewater plants, do not meet the definition of an undertaking and are therefore exempt and do not require further review.

To meet project timeframes, if you would like to be a consulting party on this project, please let us know of your interest within 30 days. If you have any initial concerns with impacts of the project on religious or cultural properties, please note them in your response.

Enclosed is a map that shows the project area. The project will occur at the existing Greenwood Wastewater Treatment Plant. The flood mitigation portion of the project consists of site grading, piping, and floodway improvements; flood walls for some plant structures; a new effluent pump station; and miscellaneous improvements. The emergency generator portion of the project consists of installation of emergency generators with full power capacity, installation of instrumentation and an electrical control system to allow for automatic switching between grid electrical power and emergency generators, and miscellaneous improvements related to the emergency generators.

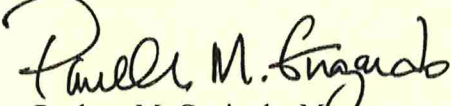
More information on the Section 106 review process is available at <https://www.hudexchange.info/programs/environmental-review/historic-preservation/>.

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If you do not wish to consult on this project, please inform us. If you do wish to consult, please include in your reply the name and contact information for the tribe's principal representative in the consultation.

Thank you very much. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your tribe that may be affected by this project.

Sincerely,


Paulette M. Guajardo, Mayor
City of Corpus Christi



CITY OF CORPUS CHRISTI
OFFICE OF THE MAYOR
PAULETTE M. GUAJARDO

February 16, 2026

Forrest Tahdooahnippah, Chairman
Comanche Nation, Oklahoma
584 NW Bingo Road
Lawton, OK 73507

Re: Greenwood WWTP Flood Mitigation & Backup Generator, 6541 Greenwood Drive,
Corpus Christi, TX 78417
HUD CDBG-MIT Grant Number 24-065-091-E767

Dear Chairman Tahdooahnippah,

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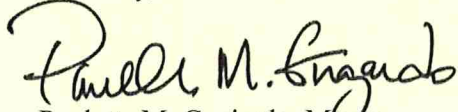
More information on the Section 106 review process is available at <https://www.hudexchange.info/programs/environmental-review/historic-preservation/>.

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Thank you very much. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your tribe that may be affected by this project.

Sincerely,


Paulette M. Guajardo, Mayor
City of Corpus Christi



CITY OF CORPUS CHRISTI
OFFICE OF THE MAYOR
PAULETTE M. GUAJARDO

February 16, 2026

Russell Martin, President
Tonkawa Tribe of Oklahoma
1 Rush Buffalo Road
Tonkawa, OK 74653

Re: Greenwood WWTP Flood Mitigation & Backup Generator, 6541 Greenwood Drive,
Corpus Christi, TX 78417
HUD CDBG-MIT Grant Number 24-065-091-E767

Dear President Martin,

The City of Corpus Christi is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City of Corpus Christi has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings and structures with significant tribal association.

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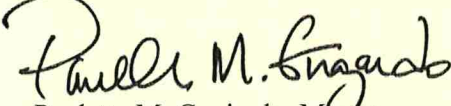
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Sincerely,


Paulette M. Guajardo, Mayor
City of Corpus Christi



CITY OF CORPUS CHRISTI
OFFICE OF THE MAYOR
PAULETTE M. GUAJARDO

February 16, 2026

Amber Silverhorn-Wolfe, President
Wichita and Affiliated Tribes
P.O. Box 729
Anadarko, OK 73005

Re: Greenwood WWTP Flood Mitigation & Backup Generator, 6541 Greenwood Drive,
Corpus Christi, TX 78417
HUD CDBG-MIT Grant Number 24-065-091-E767

Dear President Silverhorn-Wolfe,

The City of Corpus Christi is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City of Corpus Christi has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, buildings and structures with significant tribal association.

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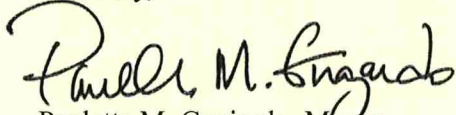
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Thank you very much. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your tribe that may be affected by this project.

Sincerely,

A handwritten signature in black ink that reads "Paulette M. Guajardo". The signature is written in a cursive style with a large initial "P".

Paulette M. Guajardo, Mayor
City of Corpus Christi



Google Earth

1000 ft



Note: Property Boundaries Shown are Approximate.



Drawn By:	TLD	Scale:	As Shown
Project Number:	24L0174A_07	Date:	2/11/26

Site Map
 Greenwood WWTP
 6541 Greenwood Drive, Corpus Christi,
 Nueces County, Texas

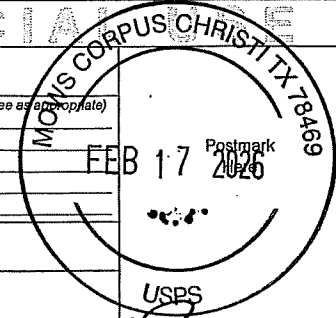
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Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$
Total Postage and Fees	\$



Sent To *Amber Silverthorn-Worke, President*
 Street and Apt. No., or PO Box No. *PO Box 729*
 City, State, ZIP+4® *Anadarko, OK 73005* *AW*

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

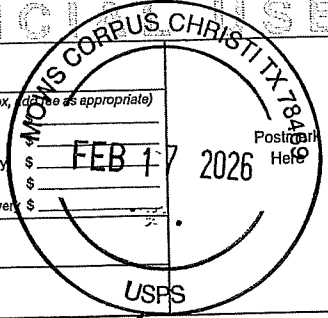
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Extra Services & Fees (check box, add fee as appropriate)	
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<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$
Total Postage and Fees	\$



Sent To *Russell Cooper, Chairman*
 Street and Apt. No., or PO Box No. *311 East Colorado Drive*
 City, State, ZIP+4® *Anadarko, OK 73005* *AW*

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

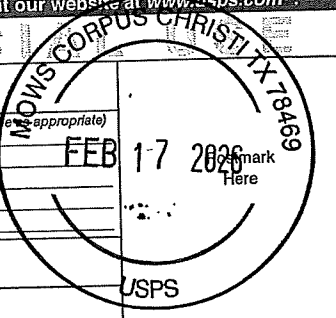
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<input type="checkbox"/> Return Receipt (hardcopy)	\$
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<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$
Total Postage and Fees	\$



Sent To *Russell Martin, President*
 Street and Apt. No., or PO Box No. *Rish Buffalo Road*
 City, State, ZIP+4® *Tonkawa, OK 74453* *AW*

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

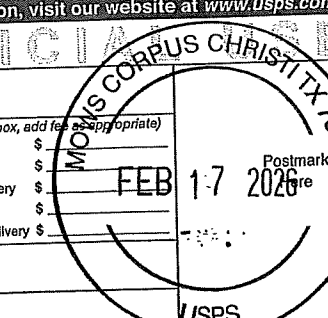
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Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
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<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$
Total Postage and Fees	\$

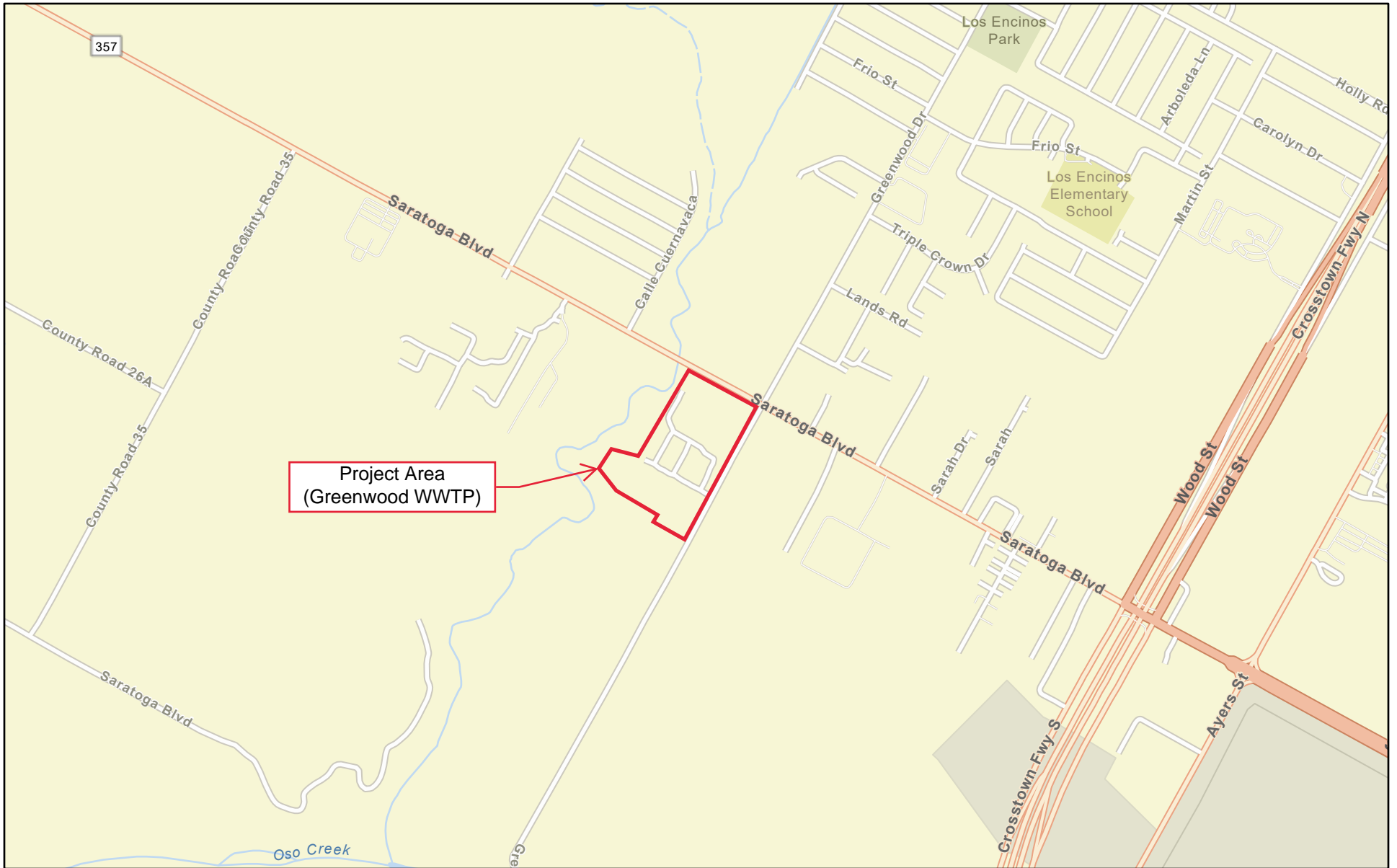


Sent To *Forrest Tahdoah nippah, Chairman*
 Street and Apt. No., or PO Box No. *584 NW Bingo Road*
 City, State, ZIP+4® *Lanton, OK 73507* *AW*

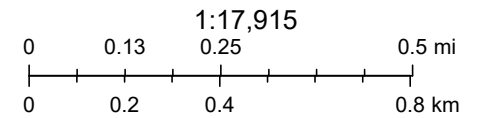
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

**Attachment L –
THC Map**

THC Map - Greenwood WWTP



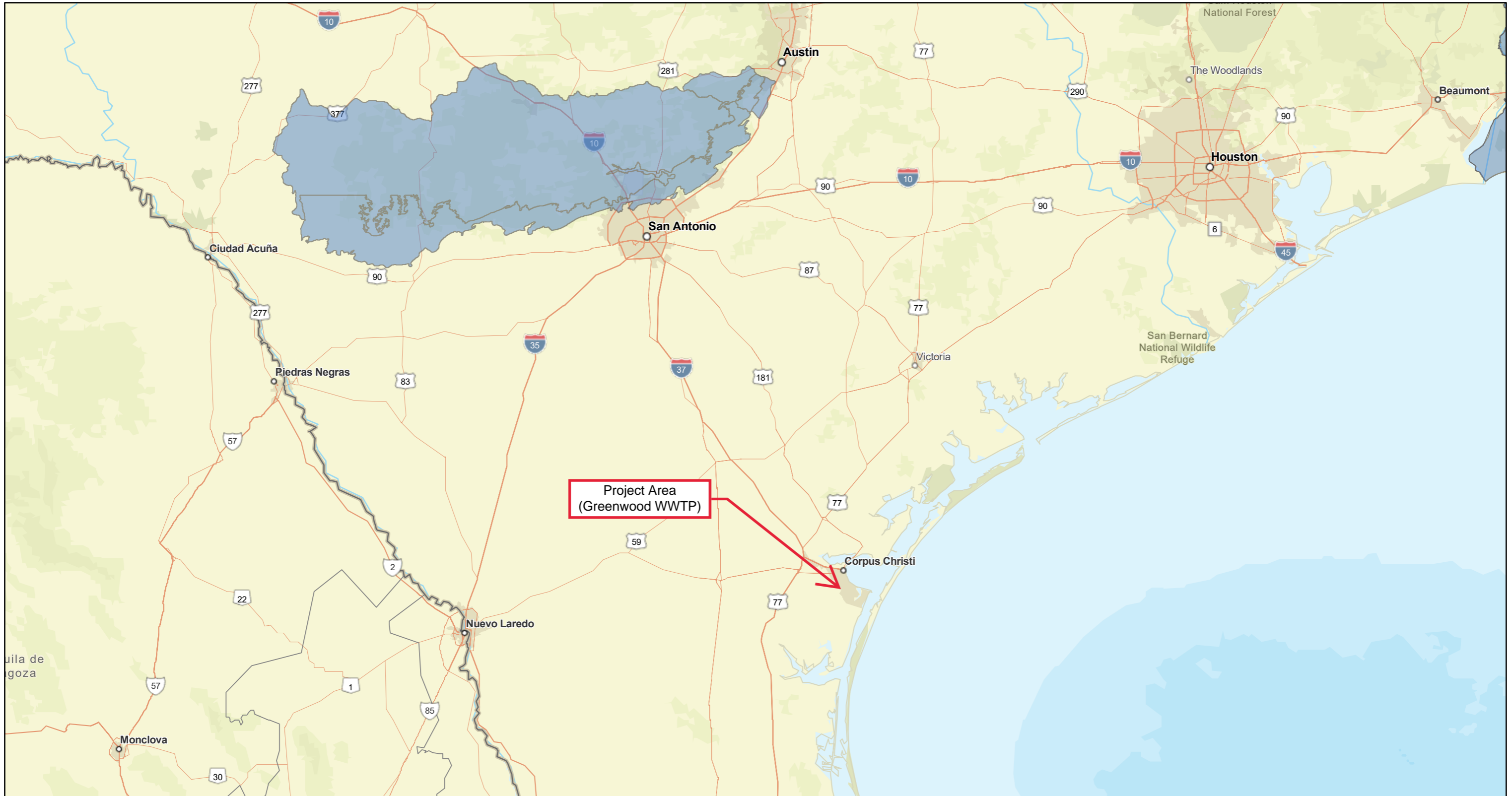
2/12/2026




Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

**Attachment M –
Sole Source Aquifers Map**

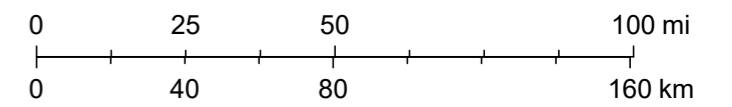
Sole Source Aquifer Map



11/5/2025, 8:32:07 AM

 Sole_Source_Aquifers

1:2,320,803



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

**Attachment N –
NWI Map**



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

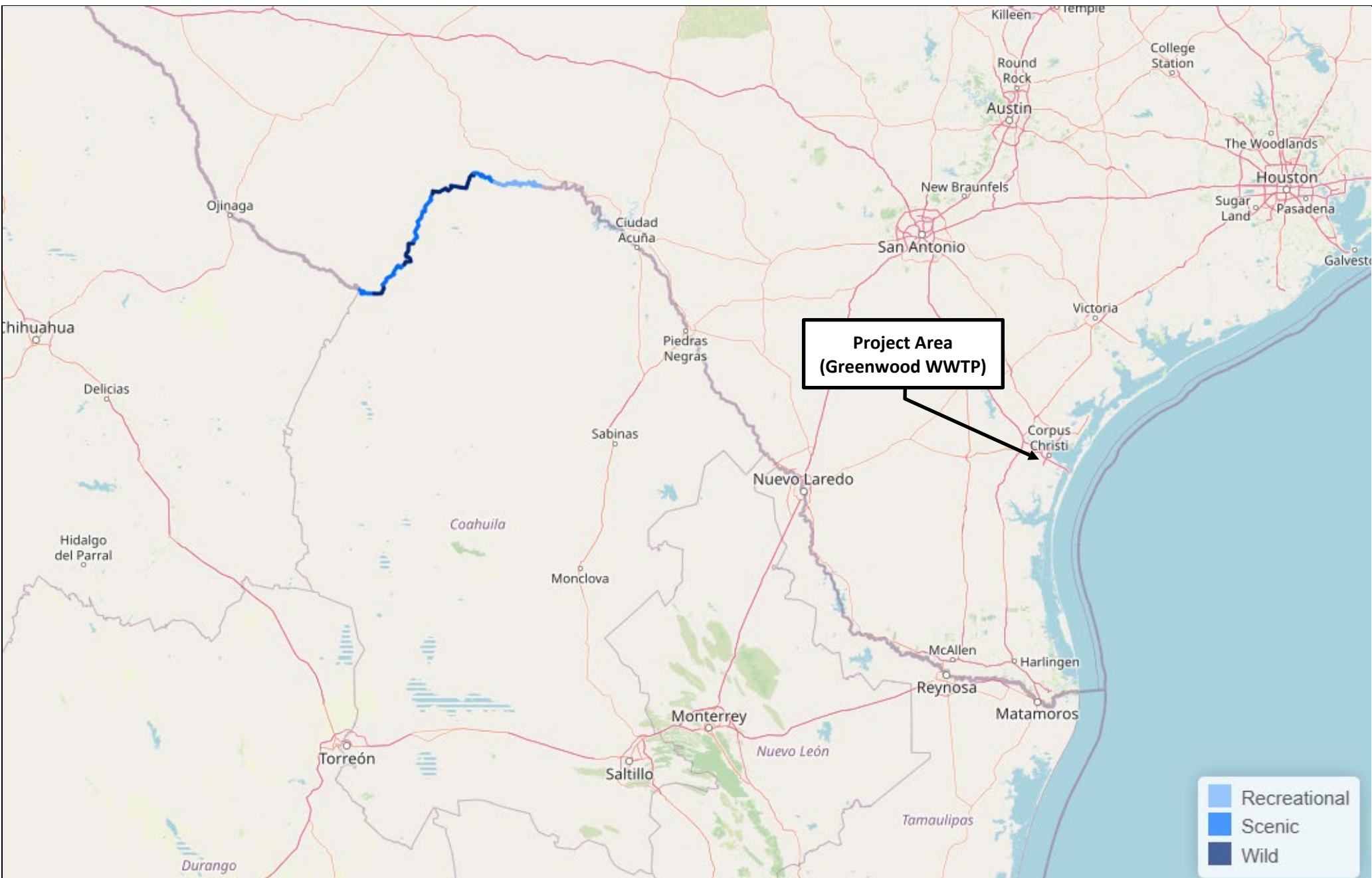
December 11, 2025

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

**Attachment O –
NWSRS Map**



Note: Property location shown is approximate.

Drawn By:	TLD	Scale:	As Shown
Project Number:	24L0174A_07	Date:	11/5/25

Wild and Scenic Rivers Map
 Greenwood Wastewater Treatment Plant
 6541 Greenwood Drive, Corpus Christi, Nueces County, Texas

Attachment P –

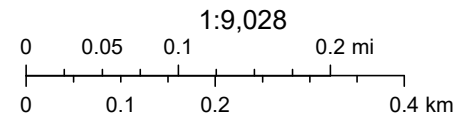
**City of Corpus Christi Zoning Map and Zoning
Information from Unified Development Code**

Corpus Christi Zoning Map



11/5/2025, 10:41:54 AM

- City Limits
- Zoning
- Subdivisions



Texas Parks & Wildlife, Esri, HERE, Garmin, INCREMENT P, Intermap, USGS, METI/NASA, EPA, USDA

ArcGIS Web AppBuilder

§ 4.3 Single-Family Residential Districts

4.3.1. Purpose Statements

A. Farm-Rural District Regulations

The Farm-Rural zoning district includes lands that are relatively underdeveloped and agricultural in nature. The zoning district is intended to permit the continued use of the land for agricultural purposes. It is the default zoning district for land newly-annexed to the City, but not yet placed in a zoning classification appropriate for final use.

B. Residential Estate District Regulations

The Residential Estate zoning district provides for single-family residential development of a spacious character together with related recreational facilities normally required to provide an orderly, attractive and spacious residential living environment. The lots are a minimum of 1 acre in area and are not intended to be served by City water, wastewater or storm water services. The zoning district is intended to retain a rural character.

C. Single-Family 15, 10, and 6 Districts

The Single-Family 15, 10 and 6 zoning districts provide for orderly suburban residential development and redevelopment. A limited number of public and civic uses are allowed, subject to the restrictions necessary to preserve and protect the single-family character of the neighborhood.

D. Single-Family 4.5 District

The Single-Family 4.5 zoning district provides for residential development and redevelopment at a higher density than the other residential zoning districts. A limited number of public and civic uses are allowed, subject to the restrictions necessary to preserve and protect the single-family character of the neighborhood.

4.3.2. Permitted Uses

The following principal uses are permitted by right, permitted subject to limitations, or require a special use exception or special permit in the single-family residential zoning districts. Uses may be subject to additional limitations specified in Section 6.5 when located inside a Navy Air Installation Compatible use Zone (AICUZ) (including Clear and Accident Potential Zones 1 2).

Table 4.3.2 Permitted Uses (Single-family districts)								
SINGLE-FAMILY DISTRICTS								
P = Permitted Use; SP = Special Permit; L = Subject to Limitations; [blank cell] = Not Permitted; SUE = Special Use Exception	FR	RE	RS- 22	RS- 15	RS -	RS-6	RS-4.5	Standards
Residential Uses								
Single-family detached house except:	P	P	P	P	P	P	P	
---Industrialized / Modular Housing	L	L	L	L	L	L	L	4.3.7
--Manufactured Housing								6.1.1
Traditional house			L	L	L	L	L	4.3.5
Semi-attached house					L	L		4.3.5
Group home [6 or fewer residents]	P	P	P	P	P	P	P	
Community Home	P	P	P	P	P	P	P	5.2.26
Public and Civic Uses								
Community Service Uses [5.1.3.A]	L	L	L	L	L	L	L	5.2.3
Day care center	L							5.2.4.B
Day care home [6 or fewer children]	L	L	L	L	L	L	L	5.2.4.C
Educational Facility Uses [5.1.3.C]	P	P	P	P	P	P	P	

Table 4.3.2 Permitted Uses (Single-family districts)								
SINGLE-FAMILY DISTRICTS								
P = Permitted Use; SP = Special Permit; L = Subject to Limitations; [blank cell] = Not Permitted; SUE = Special Use Exception	FR	RE	RS- 22	RS- 15	RS -	RS-6	RS- 4.5	Standards
Parks and Open Area Uses [5.1.3.F] except for:	P	P	P	P	P	P	P	
---Cemetery, columbaria, mausoleum, memorial park								SP for existing facilities expanding on same or adjacent property only
---Crematorium (human or animal)								
Golf course	P	P	L	L	L	L	L	5.2.5
Place of Worship Uses	P	P	P	P	P	P	P	
Utilities, major [5.1.3.I] except for:	L	L	L	L	L	L	L	5.2.6
---Wind energy units	L	L	L	L	L	L	L	5.6.4
Utilities, minor [5.1.3.I]	P	P	P	P	P	P	P	
Wireless telecommunication facility								See Section 5.5
Commercial Uses								
Bed and breakfast home	SP	SP	SP	SP	SP	SP		5.2.8
Farmers market	L							5.2.9
Veterinarian or animal hospital with outdoor runs and kennels.	P							
Industrial Uses								
Storage of explosives or other hazardous materials.	SUE	SUE						
Above ground fuel tanks	SUE							
Other Uses								
Agriculture Uses [5.1.6.A] except for:	P							
---Kennel or animal shelter, indoor and outdoor	L							5.2.18
---Stable, public or private	L	L						5.2.19
Resource Extraction Uses [5.1.6.B]	P							

(Ordinance 029929, 08/27/2013; Ordinance 030769, 02/16/2016; Ordinance 030832, 05/02/2016; (Ordinance [031205](#), 08/08/2017; Ordinance [032357](#), 02/23/2021))

4.3.3. Residential Development Standards

Table 4.3.3 Residential Development (single-family districts)							
SINGLE-FAMILY DISTRICTS	FR	RE	RS-22	RS-15	RS-10	RS-6	RS-4.5
Min Lot Area	5 ac.	1 ac.	22,000	15,000	10,000	6,000	4,500
Min. Lot Width (Ft.)	150	100	75	50	50	50	45
Min. Yards (ft.)			25			25	20
Street	50	25		25	25		
Street (corner)	25	25	See 4.2.10				
Side (single)	25	15 ¹	10	5	5	5	5
Side (total)	50	30 ¹	20	10	10	10	10
Rear	25	15	10	5	5	5	5
Min. Open Space			30%	30%	30%	30%	30%

Table 4.3.3 Residential Development (single-family districts)

SINGLE-FAMILY DISTRICTS	FR	RE	RS-22	RS-15	RS-10	RS-6	RS-4.5
Max. Height (ft.)	45	35	35	35	35	35	35

(Ordinance 029376, 02/21/2012) (Ordinance 029929, 08/27/2013) (Ordinance 030769, 02/16/2016) (Ordinance [032357](#), 02/23/2021)

¹ Reduced side yard setback to 5-feet for detached non-habitable structures without residential use only.

All development shall be required to comply with this Section and all other requirements of this Code. In the event of a conflict between those requirements and this Section, the requirements of this Section shall prevail.

Minimum lot sizes and widths

Minimum lot sizes and widths shall be the same as prescribed for single family homes in the zoning district in which development is proposed.

1. Dwelling Unit Setback

a. Front Yard Setback

All structures shall be set back from the front property line the minimum distance required for the front yard by the zoning district regulations applicable to the zoning district in which the proposed development is located.

b. Rear Yard Setback

All structures shall be setback from the rear property line the minimum distance required for the rear yard by the zoning district regulations applicable to the zoning district in which the proposed development is located. Accessory pools, sheds, and other permitted accessory buildings shall only be permitted to encroach within the required rear yard up to 5 feet from any property line, but not in any easement.

c. Street Corner Setback

The minimum street corner setback shall be the same as the zoning district in which the development is proposed.

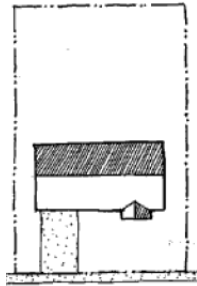
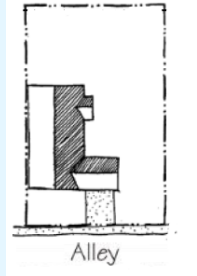
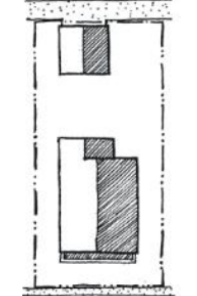
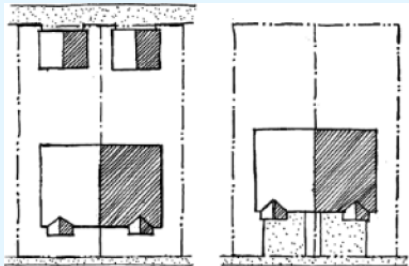
2. Accessory Buildings and Structures

Accessory Uses and Structures shall comply with Section 5.3

(Ordinance [032357](#), 02/23/2021)

4.3.4. Housing Types

The following single-family housing types are established to provide a common terminology for housing in the City. All drawings in this Section are for illustrative purposes only.

Table 4.3.4 Housing Types	
DESCRIPTION	ILLUSTRATION
<p>Single-Family Detached House A dwelling unit located on a single lot with private yards on all four sides. (Industrialized/Modular Housing is considered a single-family detached house. See Subsection 4.3.7) (Ordinance 030769, 02/16/2016)</p>	
<p>Zero Lot Line House A dwelling unit located on a single lot with private yards on three sides. The unit has only a single side yard comprising the equivalent of two side yards of a single-family detached house.</p>	
<p>Traditional House A dwelling unit with alley access located on a single lot with private yards on all four sides. However, the house shall be set much closer to the street than a single-family detached house.</p>	
<p>Attached House Two attached single-family units located on two separately owned lots that share a common wall along the lot line, providing for fee-simple ownership.</p>	

4.3.5 Reserved

4.3.6. Traditional House

An alley shall be provided to the rear of all traditional houses. All vehicular access shall take place from the alley.

4.3.7. Industrialized Housing

4.3.7.A Definition

1. Industrialized housing is a residential structure that is:
 - a. Designed for the occupancy of one or more families;
 - b. Constructed in one or more modules or constructed using one or more modular components built at a location other than the permanent site; and
 - c. Designed to be used as a permanent residential structure when the module or the modular component is transported to the permanent site and erected or installed on a permanent foundation system.
2. Industrialized housing includes the structure’s plumbing, heating, air conditioning, and electrical system.
3. Industrialized housing does not include:

- a. Housing constructed of a sectional or panelized system that does not use a modular component; or
- b. A ready-built home constructed in a manner in which the entire living area is contained in a single unit or section at a temporary location for the purpose of selling and moving the home to another location.

(Ordinance [031878](#), 09/24/2019)

4.3.7.B Construction or Installation of Industrialized Housing

1. In relation to the on-site construction or installation of industrialized housing, the [Building Official](#) shall:
 - a. Require and review, for compliance with mandatory [building](#) codes, a complete set of designs, plans, and specifications;
 - b. Require that all applicable local permits and licenses that are applicable to single and two-family [dwellings](#) be obtained before construction begins on a building site;
 - c. Require that all modules or modular components bear an approved decal or insignia indicating inspection by the Texas Department of Licensing and Regulation; and
 - d. Establish procedures for the inspection of:
 - i. The erection and installation of industrialized housing or buildings to be located in the municipality, to ensure compliance with mandatory building codes and commission rules; and
 - ii. All foundation and other on-site construction to ensure compliance and approved designs, plans, and specifications.
2. Procedures described by subparagraph [4.3.7.B.1.d](#) above shall require:
 - a. Before occupancy, a final inspection or test in accordance with mandatory building codes; and
 - b. Correction of any deficiency identified by the test or discovered in the final inspection.

4.3.7.C Single-and Two-Family Industrialized Housing Design Standards

1. For purposes of this subsection, single-or two-family industrialized housing is real property.
2. Single-or two-family industrialized housing shall:
 - a. Have a value equal to or greater than the median taxable value for each single-or two-family [dwelling](#) located within 500 feet of the [lot](#) on which the industrialized house is proposed to be located, as determined after installation of the house by the most recent certified tax appraisal roll for each county in which the properties are located;
 - b. Have exterior siding, roofing, roof pitch, foundation, fascia, and fenestration compatible with the single-or two-family [dwellings](#) located within 500 feet of the [lot](#) on which the industrialized housing is proposed to be located.
 - c. Comply with all standards in this Unified Development Code applicable to single-or two-family dwellings; and
 - d. Be securely fixed to a [permanent foundation](#).

5.1.3.I. Utility

Public and Civic Use - Utility		
Characteristics: Public or private infrastructure serving a limited area with generally no on-site personnel (Minor Utility) or the community at-large and possibly having on-site personnel (Major Utility).		
Principal Uses	Accessory Uses	Uses Not Included
<p>Minor Utilities:</p> <ul style="list-style-type: none"> • Storm water retention and detention facility • Telephone exchange <p>Major Utilities:</p> <ul style="list-style-type: none"> • Artesian well • Cell antennae • Electrical substation • Filter bed • Railroad switching yard, roundhouse, or repair shop • Stealth cell antennae • Television and radio broadcasting antenna • Waste treatment plant • Water and wastewater pump station • Water towers, tanks, or standpipe • Wind energy conversion system or wind-driven generator • Wireless telecommunication facility <p>Exempt Utilities:</p> <ul style="list-style-type: none"> • Public/Semi-Public Infrastructure (ie. water, wastewater, storm water, gas, electrical, fiber optics) 	<ul style="list-style-type: none"> • Control, monitoring, data or transmission equipment • Off-street parking • Satellite dish antenna under 3.2 feet* • Stealth cell antennae Storage 	<ul style="list-style-type: none"> • Landfill (see Waste-Related Service) • Reservoir (see Parks and Open Areas) • TV and radio studio (see Office) • Utility office (see Office) • Vehicle and equipment maintenance facility (see Light Industrial Service)
<p>*See additional standards in Subsection 5.3.2</p>		

(Ordinance [032357](#), 02/23/2021)

**Attachment Q –
NRCS Soil Report**



United States
Department of
Agriculture

NRCS

Natural
Resources
Conservation
Service

A product of the National
Cooperative Soil Survey,
a joint effort of the United
States Department of
Agriculture and other
Federal agencies, State
agencies including the
Agricultural Experiment
Stations, and local
participants

Custom Soil Resource Report for Nueces County, Texas



Preface

Soil surveys contain information that affects land use planning in survey areas. They highlight soil limitations that affect various land uses and provide information about the properties of the soils in the survey areas. Soil surveys are designed for many different users, including farmers, ranchers, foresters, agronomists, urban planners, community officials, engineers, developers, builders, and home buyers. Also, conservationists, teachers, students, and specialists in recreation, waste disposal, and pollution control can use the surveys to help them understand, protect, or enhance the environment.

Various land use regulations of Federal, State, and local governments may impose special restrictions on land use or land treatment. Soil surveys identify soil properties that are used in making various land use or land treatment decisions. The information is intended to help the land users identify and reduce the effects of soil limitations on various land uses. The landowner or user is responsible for identifying and complying with existing laws and regulations.

Although soil survey information can be used for general farm, local, and wider area planning, onsite investigation is needed to supplement this information in some cases. Examples include soil quality assessments (<http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/health/>) and certain conservation and engineering applications. For more detailed information, contact your local USDA Service Center (<https://offices.sc.egov.usda.gov/locator/app?agency=nrcs>) or your NRCS State Soil Scientist (http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/contactus/?cid=nrcs142p2_053951).

Great differences in soil properties can occur within short distances. Some soils are seasonally wet or subject to flooding. Some are too unstable to be used as a foundation for buildings or roads. Clayey or wet soils are poorly suited to use as septic tank absorption fields. A high water table makes a soil poorly suited to basements or underground installations.

The National Cooperative Soil Survey is a joint effort of the United States Department of Agriculture and other Federal agencies, State agencies including the Agricultural Experiment Stations, and local agencies. The Natural Resources Conservation Service (NRCS) has leadership for the Federal part of the National Cooperative Soil Survey.

Information about soils is updated periodically. Updated information is available through the NRCS Web Soil Survey, the site for official soil survey information.

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or a part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require

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How Soil Surveys Are Made

Soil surveys are made to provide information about the soils and miscellaneous areas in a specific area. They include a description of the soils and miscellaneous areas and their location on the landscape and tables that show soil properties and limitations affecting various uses. Soil scientists observed the steepness, length, and shape of the slopes; the general pattern of drainage; the kinds of crops and native plants; and the kinds of bedrock. They observed and described many soil profiles. A soil profile is the sequence of natural layers, or horizons, in a soil. The profile extends from the surface down into the unconsolidated material in which the soil formed or from the surface down to bedrock. The unconsolidated material is devoid of roots and other living organisms and has not been changed by other biological activity.

Currently, soils are mapped according to the boundaries of major land resource areas (MLRAs). MLRAs are geographically associated land resource units that share common characteristics related to physiography, geology, climate, water resources, soils, biological resources, and land uses (USDA, 2006). Soil survey areas typically consist of parts of one or more MLRA.

The soils and miscellaneous areas in a survey area occur in an orderly pattern that is related to the geology, landforms, relief, climate, and natural vegetation of the area. Each kind of soil and miscellaneous area is associated with a particular kind of landform or with a segment of the landform. By observing the soils and miscellaneous areas in the survey area and relating their position to specific segments of the landform, a soil scientist develops a concept, or model, of how they were formed. Thus, during mapping, this model enables the soil scientist to predict with a considerable degree of accuracy the kind of soil or miscellaneous area at a specific location on the landscape.

Commonly, individual soils on the landscape merge into one another as their characteristics gradually change. To construct an accurate soil map, however, soil scientists must determine the boundaries between the soils. They can observe only a limited number of soil profiles. Nevertheless, these observations, supplemented by an understanding of the soil-vegetation-landscape relationship, are sufficient to verify predictions of the kinds of soil in an area and to determine the boundaries.

Soil scientists recorded the characteristics of the soil profiles that they studied. They noted soil color, texture, size and shape of soil aggregates, kind and amount of rock fragments, distribution of plant roots, reaction, and other features that enable them to identify soils. After describing the soils in the survey area and determining their properties, the soil scientists assigned the soils to taxonomic classes (units). Taxonomic classes are concepts. Each taxonomic class has a set of soil characteristics with precisely defined limits. The classes are used as a basis for comparison to classify soils systematically. Soil taxonomy, the system of taxonomic classification used in the United States, is based mainly on the kind and character of soil properties and the arrangement of horizons within the profile. After the soil

Custom Soil Resource Report

scientists classified and named the soils in the survey area, they compared the individual soils with similar soils in the same taxonomic class in other areas so that they could confirm data and assemble additional data based on experience and research.

The objective of soil mapping is not to delineate pure map unit components; the objective is to separate the landscape into landforms or landform segments that have similar use and management requirements. Each map unit is defined by a unique combination of soil components and/or miscellaneous areas in predictable proportions. Some components may be highly contrasting to the other components of the map unit. The presence of minor components in a map unit in no way diminishes the usefulness or accuracy of the data. The delineation of such landforms and landform segments on the map provides sufficient information for the development of resource plans. If intensive use of small areas is planned, onsite investigation is needed to define and locate the soils and miscellaneous areas.

Soil scientists make many field observations in the process of producing a soil map. The frequency of observation is dependent upon several factors, including scale of mapping, intensity of mapping, design of map units, complexity of the landscape, and experience of the soil scientist. Observations are made to test and refine the soil-landscape model and predictions and to verify the classification of the soils at specific locations. Once the soil-landscape model is refined, a significantly smaller number of measurements of individual soil properties are made and recorded. These measurements may include field measurements, such as those for color, depth to bedrock, and texture, and laboratory measurements, such as those for content of sand, silt, clay, salt, and other components. Properties of each soil typically vary from one point to another across the landscape.

Observations for map unit components are aggregated to develop ranges of characteristics for the components. The aggregated values are presented. Direct measurements do not exist for every property presented for every map unit component. Values for some properties are estimated from combinations of other properties.

While a soil survey is in progress, samples of some of the soils in the area generally are collected for laboratory analyses and for engineering tests. Soil scientists interpret the data from these analyses and tests as well as the field-observed characteristics and the soil properties to determine the expected behavior of the soils under different uses. Interpretations for all of the soils are field tested through observation of the soils in different uses and under different levels of management. Some interpretations are modified to fit local conditions, and some new interpretations are developed to meet local needs. Data are assembled from other sources, such as research information, production records, and field experience of specialists. For example, data on crop yields under defined levels of management are assembled from farm records and from field or plot experiments on the same kinds of soil.

Predictions about soil behavior are based not only on soil properties but also on such variables as climate and biological activity. Soil conditions are predictable over long periods of time, but they are not predictable from year to year. For example, soil scientists can predict with a fairly high degree of accuracy that a given soil will have a high water table within certain depths in most years, but they cannot predict that a high water table will always be at a specific level in the soil on a specific date.

After soil scientists located and identified the significant natural bodies of soil in the survey area, they drew the boundaries of these bodies on aerial photographs and

Custom Soil Resource Report

identified each as a specific map unit. Aerial photographs show trees, buildings, fields, roads, and rivers, all of which help in locating boundaries accurately.

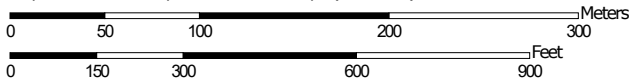
Soil Map

The soil map section includes the soil map for the defined area of interest, a list of soil map units on the map and extent of each map unit, and cartographic symbols displayed on the map. Also presented are various metadata about data used to produce the map, and a description of each soil map unit.

Custom Soil Resource Report Soil Map



Map Scale: 1:3,990 if printed on A landscape (11" x 8.5") sheet.




Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 14N WGS84




MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)


Soils


 Soil Map Unit Polygons


 Soil Map Unit Lines


 Soil Map Unit Points

Special Point Features

 Blowout

 Borrow Pit


 Clay Spot

 Closed Depression

 Gravel Pit

 Gravelly Spot


 Landfill

 Lava Flow

 Marsh or swamp

 Mine or Quarry

 Miscellaneous Water


 Perennial Water

 Rock Outcrop


 Saline Spot

 Sandy Spot

 Severely Eroded Spot


 Sinkhole

 Slide or Slip


 Sodic Spot


 Spoil Area

 Stony Spot


 Very Stony Spot

 Wet Spot

 Other

 Special Line Features

Water Features

 Streams and Canals


Transportation

 Rails


 Interstate Highways

 US Routes

 Major Roads

 Local Roads

Background

 Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
 Web Soil Survey URL:
 Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Nueces County, Texas
 Survey Area Data: Version 24, Sep 5, 2025

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Oct 18, 2023—Oct 20, 2023

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
Gu	Gullied land	3.9	14.8%
VcA	Victoria clay 0 to 1 percent slopes	3.0	11.6%
VcB	Victoria clay, 1 to 3 percent slopes	19.2	73.6%
Totals for Area of Interest		26.1	100.0%

Map Unit Descriptions

The map units delineated on the detailed soil maps in a soil survey represent the soils or miscellaneous areas in the survey area. The map unit descriptions, along with the maps, can be used to determine the composition and properties of a unit.

A map unit delineation on a soil map represents an area dominated by one or more major kinds of soil or miscellaneous areas. A map unit is identified and named according to the taxonomic classification of the dominant soils. Within a taxonomic class there are precisely defined limits for the properties of the soils. On the landscape, however, the soils are natural phenomena, and they have the characteristic variability of all natural phenomena. Thus, the range of some observed properties may extend beyond the limits defined for a taxonomic class. Areas of soils of a single taxonomic class rarely, if ever, can be mapped without including areas of other taxonomic classes. Consequently, every map unit is made up of the soils or miscellaneous areas for which it is named and some minor components that belong to taxonomic classes other than those of the major soils.

Most minor soils have properties similar to those of the dominant soil or soils in the map unit, and thus they do not affect use and management. These are called noncontrasting, or similar, components. They may or may not be mentioned in a particular map unit description. Other minor components, however, have properties and behavioral characteristics divergent enough to affect use or to require different management. These are called contrasting, or dissimilar, components. They generally are in small areas and could not be mapped separately because of the scale used. Some small areas of strongly contrasting soils or miscellaneous areas are identified by a special symbol on the maps. If included in the database for a given area, the contrasting minor components are identified in the map unit descriptions along with some characteristics of each. A few areas of minor components may not have been observed, and consequently they are not mentioned in the descriptions, especially where the pattern was so complex that it was impractical to make enough observations to identify all the soils and miscellaneous areas on the landscape.

The presence of minor components in a map unit in no way diminishes the usefulness or accuracy of the data. The objective of mapping is not to delineate pure taxonomic classes but rather to separate the landscape into landforms or landform segments that have similar use and management requirements. The

Custom Soil Resource Report

delineation of such segments on the map provides sufficient information for the development of resource plans. If intensive use of small areas is planned, however, onsite investigation is needed to define and locate the soils and miscellaneous areas.

An identifying symbol precedes the map unit name in the map unit descriptions. Each description includes general facts about the unit and gives important soil properties and qualities.

Soils that have profiles that are almost alike make up a *soil series*. Except for differences in texture of the surface layer, all the soils of a series have major horizons that are similar in composition, thickness, and arrangement.

Soils of one series can differ in texture of the surface layer, slope, stoniness, salinity, degree of erosion, and other characteristics that affect their use. On the basis of such differences, a soil series is divided into *soil phases*. Most of the areas shown on the detailed soil maps are phases of soil series. The name of a soil phase commonly indicates a feature that affects use or management. For example, Alpha silt loam, 0 to 2 percent slopes, is a phase of the Alpha series.

Some map units are made up of two or more major soils or miscellaneous areas. These map units are complexes, associations, or undifferentiated groups.

A *complex* consists of two or more soils or miscellaneous areas in such an intricate pattern or in such small areas that they cannot be shown separately on the maps. The pattern and proportion of the soils or miscellaneous areas are somewhat similar in all areas. Alpha-Beta complex, 0 to 6 percent slopes, is an example.

An *association* is made up of two or more geographically associated soils or miscellaneous areas that are shown as one unit on the maps. Because of present or anticipated uses of the map units in the survey area, it was not considered practical or necessary to map the soils or miscellaneous areas separately. The pattern and relative proportion of the soils or miscellaneous areas are somewhat similar. Alpha-Beta association, 0 to 2 percent slopes, is an example.

An *undifferentiated group* is made up of two or more soils or miscellaneous areas that could be mapped individually but are mapped as one unit because similar interpretations can be made for use and management. The pattern and proportion of the soils or miscellaneous areas in a mapped area are not uniform. An area can be made up of only one of the major soils or miscellaneous areas, or it can be made up of all of them. Alpha and Beta soils, 0 to 2 percent slopes, is an example.

Some surveys include *miscellaneous areas*. Such areas have little or no soil material and support little or no vegetation. Rock outcrop is an example.

Nueces County, Texas

Gu—Gullied land

Map Unit Setting

National map unit symbol: dg38
Elevation: 10 to 6,000 feet
Mean annual precipitation: 10 to 46 inches
Mean annual air temperature: 57 to 73 degrees F
Frost-free period: 220 to 320 days
Farmland classification: Not prime farmland

Map Unit Composition

Gullied land: 80 percent
Minor components: 20 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Gullied Land

Typical profile

H1 - 0 to 40 inches: variable

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: D
Hydric soil rating: No

Minor Components

Gullied land, saline

Percent of map unit: 10 percent
Hydric soil rating: No

Victoria

Percent of map unit: 10 percent
Ecological site: R150AY526TX - Southern Blackland
Hydric soil rating: No

VcA—Victoria clay 0 to 1 percent slopes

Map Unit Setting

National map unit symbol: 2tj1f
Elevation: 20 to 100 feet
Mean annual precipitation: 29 to 37 inches
Mean annual air temperature: 71 to 73 degrees F
Frost-free period: 301 to 365 days
Farmland classification: All areas are prime farmland

Map Unit Composition

Victoria and similar soils: 97 percent

Minor components: 3 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Victoria

Setting

Landform: Flats

Landform position (three-dimensional): Talf

Microfeatures of landform position: Gilgai

Down-slope shape: Linear

Across-slope shape: Linear

Parent material: Clayey fluviomarine deposits derived from igneous, metamorphic and sedimentary rock

Typical profile

Ap - 0 to 6 inches: clay

Bss - 6 to 37 inches: clay

Bnss - 37 to 50 inches: clay

Bkny - 50 to 80 inches: clay

Properties and qualities

Slope: 0 to 1 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Runoff class: Medium

Capacity of the most limiting layer to transmit water (Ksat): Moderately low to moderately high (0.06 to 0.20 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 19 percent

Gypsum, maximum content: 7 percent

Maximum salinity: Nonsaline to moderately saline (0.5 to 14.5 mmhos/cm)

Sodium adsorption ratio, maximum: 29.0

Available water supply, 0 to 60 inches: Moderate (about 9.0 inches)

Interpretive groups

Land capability classification (irrigated): 2s

Land capability classification (nonirrigated): 2s

Hydrologic Soil Group: C

Ecological site: R150AY526TX - Southern Blackland

Hydric soil rating: No

Minor Components

Cranell

Percent of map unit: 2 percent

Landform: Flats

Landform position (three-dimensional): Talf

Down-slope shape: Linear

Across-slope shape: Linear

Ecological site: R150AY526TX - Southern Blackland

Hydric soil rating: No

Edroy

Percent of map unit: 1 percent
Landform: Depressions
Landform position (three-dimensional): Dip
Down-slope shape: Concave
Across-slope shape: Concave
Ecological site: R150AY641TX - Lakebed
Hydric soil rating: Yes

VcB—Victoria clay, 1 to 3 percent slopes

Map Unit Setting

National map unit symbol: 2v39n
Elevation: 20 to 100 feet
Mean annual precipitation: 29 to 37 inches
Mean annual air temperature: 71 to 73 degrees F
Frost-free period: 301 to 365 days
Farmland classification: All areas are prime farmland

Map Unit Composition

Victoria and similar soils: 97 percent
Minor components: 3 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Victoria

Setting

Landform: Flats
Landform position (three-dimensional): Rise
Microfeatures of landform position: Gilgai
Down-slope shape: Convex
Across-slope shape: Linear
Parent material: Clayey fluviomarine deposits derived from igneous, metamorphic and sedimentary rock

Typical profile

Ap - 0 to 6 inches: clay
Bss - 6 to 37 inches: clay
Bnss - 37 to 50 inches: clay
Bkny - 50 to 80 inches: clay

Properties and qualities

Slope: 1 to 3 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: High
Capacity of the most limiting layer to transmit water (Ksat): Moderately low to moderately high (0.06 to 0.20 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None

Custom Soil Resource Report

Frequency of ponding: None
Calcium carbonate, maximum content: 19 percent
Gypsum, maximum content: 7 percent
Maximum salinity: Nonsaline to moderately saline (0.5 to 14.5 mmhos/cm)
Sodium adsorption ratio, maximum: 29.0
Available water supply, 0 to 60 inches: Moderate (about 9.0 inches)

Interpretive groups

Land capability classification (irrigated): 2s
Land capability classification (nonirrigated): 2s
Hydrologic Soil Group: C
Ecological site: R150AY526TX - Southern Blackland
Hydric soil rating: No

Minor Components

Cranell

Percent of map unit: 2 percent
Landform: Flats
Landform position (three-dimensional): Talf
Down-slope shape: Linear
Across-slope shape: Linear
Ecological site: R150AY526TX - Southern Blackland
Hydric soil rating: No

Edroy

Percent of map unit: 1 percent
Landform: Depressions
Landform position (three-dimensional): Dip
Down-slope shape: Concave
Across-slope shape: Concave
Ecological site: R150AY641TX - Lakebed
Hydric soil rating: Yes

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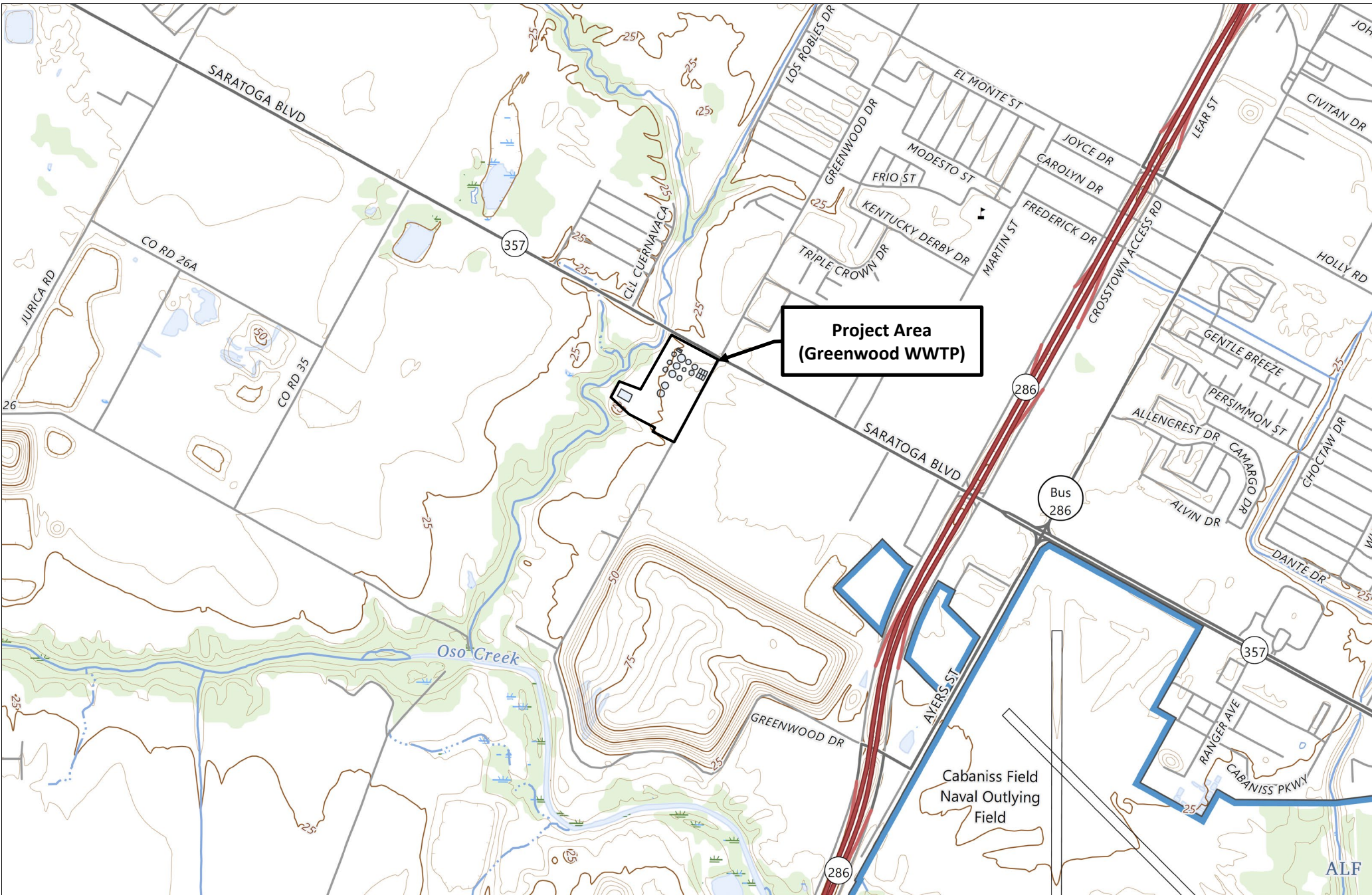
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**Attachment R –
USGS Topographic Map**



Note: Property location shown is approximate.

Drawn By:	TLD	Scale:	As Shown
Project Number:	24L0174A_07	Date:	11/5/25

Topographic Map
 Greenwood Wastewater Treatment Plant
 6541 Greenwood Drive, Corpus Christi, Nueces County, Texas

**Attachment S –
City of Corpus Christi Noise Ordinance**

Chapter 31 - NOISE

*Footnotes:**--- (1) ---*

Editor's note— Ord. No. 027440, § 1, adopted Oct. 9, 2007, repealed the former Chapter 31, §§ 31-1—31-7, and enacted a new Chapter 31 as set out herein. The former Chapter 31 pertained to similar subject matter and derived from Code 1958, §§ 22-1—22-7.

Cross reference— *Drilling oil and gas wells, Ch. 35; as to use of railroad engine whistles, see § 47-10.*

Sec. 31-1. - Definitions and standards.

A-weighted sound level means the sound pressure level in decibels as measured on a sound level meter using the A-weighting network. The level so read is designated dB(A) or dBA.

Entertainment district means the downtown, bayfront, and port areas delineated in the entertainment district map, a copy of which is incorporated by reference and is on file with the city secretary's office.

Noise nuisance means any loud, irritating, vexing or disturbing sound originating from a nearby property under separate ownership which causes injury, discomfort, or distress of a person of reasonable nervous sensibilities, or any sound that exceeds the maximum permitted sound levels specified in [section 31-3](#).

Nonresidential property shall mean any real property that is not included in the definition of residential property as defined in this section. Without limitation, the term includes properties that have been developed other than as residential properties, properties that are undeveloped, and properties that are devoted to public purposes, such as public streets and parks.

Residential property shall mean any real property developed and used for human habitation that contains living facilities, including provisions for sleeping, eating, cooking, and sanitation, unless such premises are actually occupied and used primarily for purposes other than human habitation.

Sound level means the weighted sound pressure level obtained by the use of a sound level meter and frequency weighting network as specified in American National Standards Institute specifications for sound level meters. If the frequency weighting employed is not indicated, the A-weighting shall apply.

Sound level meter means an instrument which is used to measure sound pressure levels.

(Ord. No. 027440, § 1, 10-9-2007)

Sec. 31-2. - Noise nuisance enumeration.

- (a) The following acts, among others not hereinafter enumerated, are declared to be "noise nuisances," and are unlawful and in violation of the provisions of this chapter when such acts are done or accomplished or carried on in such a manner, or with such volume, intensity, or with

continued duration, so as to annoy, to distress, or to disturb the quiet, comfort, or repose of a person of reasonable nervous sensibilities, within the vicinity or hearing thereof, or so as to endanger or injure the safety or health of humans or animals, or so as to interfere with the physical well being of humans or animals, or so as to endanger or injure personal or real property:

- (1) The playing or permitting or causing the playing of any radio, television, drum, juke box, musical instrument, sound amplifier or similar device which produces, reproduces, or amplifies sound.
- (2) The keeping of any animal, fowl, or bird, which makes frequent or long, continued noise.
- (3) The continued or frequent sounding of any horn or other signal device on any automobile or vehicle, motorcycle, bus or other vehicle, except as a danger signal.
- (4) The discharge into the open air of the exhaust of any steam engine, stationary internal combustion engine, automobile, motorcycle, or other motor vehicle or boat, except through a properly installed muffler or other device which prevents loud or explosive noises therefrom.
- (5) The crying, calling, or shouting, in person or by a mechanical device, or the use of any whistle, rattle, bell, gong, clapper, hammer, drum, horn, loudspeaker or phonograph with or without an amplifier, hand organ, or other devices or instruments, musical or otherwise.
- (6) The raucous shouting, whistling, yelling, singing, hooting, or crying of peddlers, hawkers, vendors or any other persons.
- (7) The creation of any unreasonably loud, disturbing, and unnecessary noise on any street or sidewalk adjacent to any school, hospital, or court which is in session.

(Ord. No. 027440, § 1, 10-9-2007)

Sec. 31-3. - Noise violation decibel readings.

- (a) It shall be unlawful for any person to conduct, permit, allow, or produce a sound that is discernable beyond the property lines of the property on which the sound is being produced that, when measured with a sound level meter using the standardized frequency weighting as specified by the American National Standards Institute, exceeds the applicable dB(A) level listed below for the property on which the sound is received:
 - (1) Seventy (70) dB(A) between the hours of 8:01 a.m. and 11:00 p.m. Sunday through Thursday and between the hours of 7:01 a.m. and 12:00 midnight on Friday and Saturday.
 - (2) Sixty (60) dB(A) between the hours of 11:01 p.m. and 8:00 a.m. Sunday through Thursday and between the hours of 12:01 a.m. and 7:00 a.m. on Friday and Saturday and between the hours of 12:01 a.m. and 8:00 a.m. on Sunday.
 - (3) Eighty-five (85) dB(A) for sound that both originates from and is received on property within the Entertainment District, at all times.

- (b) The dB(A) levels set forth in this section apply to the property where the sound is being received. Any sound that when measured at the property where the sound is being received exceeds the dB(A) level set forth in this section is a violation of this chapter.
- (c) Any sound originating from Cole Park shall not exceed seventy (70) dB(A) when measured from any private property.

(Ord. No. 027440, § 1, 10-9-2007)

Sec. 31-4. - Vibration.

It shall be unlawful for any person to create, maintain or cause any ground or airborne vibration which is perceptible without instruments by a person at any point on any affected property adjoining the property in which the vibration source is located unless such activity is otherwise regulated under state or federal law.

(Ord. No. 027440, § 1, 10-9-2007)

Sec. 31-5. - Vehicular mounted sound amplification systems.

It shall be unlawful for any person operating or controlling a motor vehicle in either a public or private place within the city to operate any sound amplifier which is part of, or connected to, any radio, stereo receiver, compact disc player, cassette player, or other similar device in the motor vehicle, in such a manner that, when operated, is audible at a distance of thirty (30) or more feet from the source or, when operated causes a person to be aware of the vibration accompanying the sound in any location outside the confines of the vehicle emitting the sound, noise, or vibration.

(Ord. No. 027440, § 1, 10-9-2007)

Sec. 31-6. - Exceptions.

The provisions of this chapter shall not apply to:

- (a) The emission of sound for the purpose of alerting persons to an emergency; or
- (b) Sound produced by emergency vehicles; or
- (c) Sound produced by a vehicle motor with a properly installed muffler while the vehicle is moving on a public right-of-way, public waterway, airport runway, or railway; or
- (d) Sound produced by any governmental body in the performance of a governmental function; or
- (e) Sound generated at a scheduled stadium event; by parade spectators and participants on the parade route during a permitted parade; by outdoor celebration participants sponsored or co-sponsored by the city for the general welfare of the public, except for the limitation in subsection 31-3(c); by patrons and participants using cannons and gunfire during historical battle

reenactments for which a pyrotechnic permit has been obtained and the explosives have been inspected and approved by the fire marshal; by pyrotechnic displays that are inspected and approved by the city fire marshal; or

- (f) Sound generated from normal activities conducted on public playgrounds and public or private school grounds, included but not limited to, school athletic and school entertainment events; or
- (g) Sound generated by any activity in which the regulation thereof has been preempted by state or federal law, including, but not limited to, sound produced by aircraft in flight; or
- (h) Sound generated by the normal maintenance of property, such as lawn mowing, provided the activities take place from 7:00 a.m. to 8:00 p.m.; or
- (i) Sound produced by the operation of any air-conditioning unit, heat pump, HVAC system, or swimming pool machinery which does not produce a sound exceeding seventy (70) dBA on residential property or seventy (75) dBA on nonresidential property, when measured at the nearest exterior wall of a residential or commercial building under separate ownership; or
- (j) **Sound produced by construction operations including demolition, repair, drilling, excavation, and alteration during the hours of 7:00 a.m. and 8:00 p.m., unless the work is of urgent necessity in the interest of public health and safety.**

(Ord. No. 027440, § 1, 10-9-2007)

Sec. 31-7. - Method of noise measurement.

Whenever portions of this chapter prohibit noise over a certain decibel limit, measurement of said noise shall be made with a decibel meter meeting the standards prescribed by the American National Standards Institute. Traffic, aircraft and other transportation noise sources and other background noises shall not be considered in taking measurements except where such background noise interferes with the primary noise being measured.

(Ord. No. 027440, § 1, 10-9-2007)

Sec. 31-8. - Enforcement and penalties.

- (a) Any person, firm, or corporation who violates any provision of this chapter is guilty of a misdemeanor and upon conviction is punishable by a fine as provided in section 1-6 of the Code of Ordinances of the City of Corpus Christi. Each act of violation and each day of violation is considered a separate violation.
- (b) Any person, firm, or corporation who obstructs, impedes, or interferes with a representative of the city, with a representative of a city department, with monitoring equipment, or with a person who has been ordered to abate a situation pursuant to this chapter and who is lawfully engaged

in such abatement is guilty of a misdemeanor and upon conviction is punishable by a fine as provided in section 1-6 of the Code of Ordinances of the City of Corpus Christi. Each act of violation and each day of violation is considered a separate violation.

- (c) In addition to proceeding under authority of subsections (a) and (b) of this section, the city is entitled to pursue all other criminal and civil remedies to which it is entitled under authority of statutes or other ordinances against a person, firm, or corporation that remains in violation of this chapter.

(Ord. No. 027440, § 1, 10-9-2007)

Sec. 31-9. - Identification of violator.

The persons responsible for violations of this chapter are identified as follows:

- (a) *At residential property.* Any resident present at the time of the offense, and any guest or trespasser with the ability to control the level of noise at the time of the offense when no resident is present at the time of the offense.
- (b) *At nonresidential property.* Any business owner, operator, manager, employee in charge, and all persons in control or in possession of the noise nuisance generating instrument or property at the time of the offense.
- (c) *At any location with an unattended noise nuisance producing machine, device, instrument, animal or combination of same.* Any person who leaves unattended any machine, instrument, device, animal, or any combination of same, which thereafter commences producing noise in violation of this chapter.

(Ord. No. 027440, § 1, 10-9-2007)

**Attachment T –
Photo Log of Field Inspection**

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



1. Photo taken near office on east side of subject property facing northeast. A sign for the Greenwood Water Recycling Plant can be seen. To the east, Greenwood Drive and electric distribution lines can be seen.



2. Photo taken from Greenwood Drive facing southwest. The Greenwood Wastewater Treatment Plant (WWTP) can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



3. Photo taken near office on east side of subject property facing east. Farmland can be seen to the east of the north portion of the subject property.



4. Photo taken near office on east side of subject property facing southeast. Legacy Sports fields can be seen to the east of the south portion of the subject property.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



5. Photo taken near office on east side of subject property facing south. A fire hydrant and electric distribution lines can be seen on the east side of the subject property. Across Greenwood Drive, Legacy Sports fields can be seen.



6. Photo taken on east side of WWTP facing southwest. To the right, one of the primary digesters can be seen. In the center, aeration basins are visible. To the left, the blower building and an emergency generator can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



7. Photo taken on east side of WWTP facing west. An emergency generator can be seen near the blower building.



8. Photo taken on east side of WWTP facing north. The south side of the aeration basins can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



9. Photo taken on the east side of the WWTP facing northwest. The south side of the aeration basins can be seen.



10. Photo taken on south side of WWTP facing south. Sludge drying beds can be seen on the south portion of the subject property.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



11. Two City of Corpus Christi trucks can be seen in the sludge drying beds on the south portion of the subject property.



12. Two pad mounted transformers can be seen on the south portion of the subject property near the sludge drying beds. No markings were observed to indicate the units are PCB-free.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



13. Photo taken from south-central portion of the subject property facing west. To the left, a final clarifier can be seen. To the right, fencing between the sludge drying beds and the other treatment units at the WWTP can be seen.



14. Photo taken from south-central portion of the subject property facing northwest. A final clarifier can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



15. Photo taken in south-central portion of the subject property facing northeast. To the right of the road onsite, the aeration basins can be seen. To the left, a final clarifier is visible.



16. Photo taken on west side of WWTP facing northwest. An effluent filter system facility can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



17. Photo taken on west side of WWTP facing northeast. An effluent screening facility and out-of-use UV disinfection treatment unit can be seen.



18. Photo taken on west side of WWTP facing northwest. A portable toilet and a small roller/compactor can be seen near the out-of-use UV disinfection treatment unit.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



19. Photo taken on west side of WWTP facing southeast. A final clarifier and the dissolved air floatation thickener can be seen.



20. Photo taken from west side of WWTP facing southeast. To the left, a primary clarifier and primary digestors can be seen. To the right, a final clarifier and the dissolved air floatation thickener can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



21. Photo taken from west side of WWTP facing east. Primary clarifiers and primary digesters can be seen.



22. Photo taken from west side of WWTP facing northeast. To the right, a primary clarifier can be seen. To the left, an open area, effluent pump structure, and control room are visible. In the center, the influent structure can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



23. Photo taken from west side of WWTP facing northwest. To the left, the UV system facility can be seen. To the right, an open area, effluent pump structure, and control room are visible.



24. Photo taken from west side of WWTP facing north. The south end of the UV system facility can be seen. On the right side of the facility, a drum can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



25. A label for the drum in the previous photo shows the contents of the drum as SHEP CURE 309 REZ ALL (concrete curing compound).



26. Photo taken from west side of WWTP facing northeast. The control room, lift station, and influent structure can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



27. Photo taken from west side of WWTP facing east. An effluent sampler can be seen.



28. Photo taken from west side of WWTP facing north. The northwest corner of the subject property can be seen. The control room is visible to the right.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



29. Photo taken from west side of WWTP facing north. An emergency generator can be seen near the control room.



30. Photo taken in northwest portion of WWTP facing northeast. The lift station can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



31. Photo taken in northwest portion of WWTP facing northwest. An odor control system can be seen.



32. Photo taken in northwest portion of WWTP facing northeast. An effluent pump station can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



33. Photo taken in northwest portion of WWTP facing northeast. The WWTP influent structure can be seen.



34. Photo taken in north-central portion of the WWTP facing east. A storage area with a trailer, portable diesel power system, fuel storage containers, and spare pumps can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



35. A fuel storage container in the storage area from the previous photo can be seen. The container appears to be used for diesel.



36. Spare pumps and a lawn mower can be seen in the storage area from Photo #34.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



37. Additional portable power systems in the storage area from Photo #34 can be seen.



38. Photo taken in north-central portion of the WWTP facing northeast. The east end of the influent structure can be seen. The sign above the doors reads "Oil Room". To the right of the influent structure, an old office building can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



39. Buckets of Lubriplate products, including hydraulic oil and syn lube can be seen in the "Oil Room" from the previous photo.



40. Photo taken in north-central portion of the WWTP facing east. An old office building can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



41. Photo taken in north-central portion of the WWTP facing southeast. Primary clarifiers can be seen.



42. Photo taken in northeast portion of the WWTP facing south. Primary and secondary digesters can be seen to the right. To the left, the maintenance and sludge dewatering buildings can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



43. Photo taken in northeast portion of WWTP. A workshop and storage area can be seen inside the maintenance building.



44. Photo taken in northeast portion of the WWTP facing east. A secure area with three underground AT&T cables and a residential gas meter can be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



45. Photo taken from east side of WWTP facing west. To the right, the maintenance building and several drums can be seen.



46. The drums from the previous photo are visible. Labels on the drums show the contents as Micro-Solve Grease and Odor Control. A sign for the Mechanic Shop can also be seen.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



47. Photo taken from east side of WWTP facing south. The north side of the sludge dewatering building can be seen. Dumpsters for sludge storage are visible in the building. A forklift and containers of Clarifloc CE-454 can also be seen.



48. A container near the northeast corner of the sludge dewatering building is shown. The label was illegible.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



49. Photo taken from east side of WWTP facing north. The south side of the sludge dewatering building can be seen. A forklift and dumpsters for sludge storage are visible in the building.



50. Containers near the southwest corner of the sludge dewatering building are shown. The containers appeared to be empty.

Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



51. Photo taken from east side of WWTP facing west. The digester pump building is shown. A sign stating "Heat Exchanger" is visible.



52. The interior of the digester pump building can be seen. Piping, cranes, and other equipment can be seen.

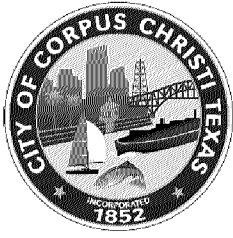
Photo Log of Site Visit – Greenwood Wastewater Treatment Plant –
6541 Greenwood Drive, Corpus Christi, Nueces County, Texas



53. Photo taken from east side of WWTP facing southwest. A primary digester labeled "Digester 3" can be seen.

Attachment U –

**Copy of Public Notices Posted on the City of Corpus
Christi's Website**



Civil Rights Public Notice
Public Service Announcement

POSTED
8/14/2025 1:47:20 PM
Rebecca Huerta
City Secretary

Citizen Participation and Civil Rights Notices Regarding CDBG-MIT Grant to City of Corpus Christi for Greenwood and Oso Wastewater Treatment Plant Improvements

The City of Corpus Christi has received a Community Development Block Grant - Mitigation (CDBG-MIT) grant through the Texas General Land Office in the amount of \$15,092,700.00 to be used to improve operational resiliency at the Greenwood and Oso Wastewater Treatment Plants (WWTPs). This project consists of three components: Greenwood WWTP Flooding Mitigation, Greenwood WWTP Emergency Backup Generator, and Oso WWTP Emergency Backup Generator. The anticipated construction completion date is December 2027. For information regarding these projects, please contact Senior Project Manager, Emily Fauver, at 361-826-4669.

The grant requires compliance with all federal rules and regulations governing citizen participation and civil rights protections in use of these funds. Civil rights protections identified in the grant include the following: Equal Opportunity/Non-discrimination; Section 3 Economic Opportunity Policy; Excessive Force Policy; Participation by HUB's, Minority, Small Business, and Women-Owned Businesses; Section 504 of the Rehabilitation Act which prohibits discrimination based on disability; Affirmatively Furthering Fair Housing; and Limited English Proficiency Standards. The City of Corpus Christi has established policies, procedures, resolutions and ordinances to comply with these requirements as applicable.

A citizen who has a comment, complaint or grievance with respect to these CDBG-MIT grant-funded projects is encouraged to submit such comment, complaint or grievance, in writing to the Director of Water Utilities, 2726 Holly Road, Corpus Christi, Texas 78415 or may call 361-826-4669 during regular business hours. The City of Corpus Christi will make every effort to respond fully to such complaints within 14 working days where practicable.



City of Corpus Christi

City Awarded \$15.1 Million for Wastewater Infrastructure Improvements

Funding Supports Flood Mitigation and Emergency Preparedness at Greenwood and Oso Wastewater Treatment Plants

By City of Corpus Christi [\(/news/authors/city-of-corpus-christi/\)](/news/authors/city-of-corpus-christi/) - Aug 28, 2025

- City News [\(/news/city-news/\)](/news/city-news/)
- Communications [\(/news/communications/\)](/news/communications/)
- Corpus Christi Water [\(/news/corpus-christi-water/\)](/news/corpus-christi-water/)

CORPUS CHRISTI, TX – Texas Land Commissioner Dawn Buckingham, M.D., presented a ceremonial check for \$15,092,700 to the City of Corpus Christi during a special presentation. The funding comes from the Texas General Land Office’s (GLO) Community Development Block Grant Mitigation (CDBG-MIT) Regional Mitigation Program and will support improvements to the City’s wastewater treatment infrastructure.

“Accepting this funding marks an important milestone for the City of Corpus Christi,” Mayor Paulette Guajardo said. “Improving our wastewater treatment facilities is essential to protecting public health, supporting responsible growth, and safeguarding our natural environment. As Mayor, I remain committed to making smart, forward-looking investments that ensure a stronger, more sustainable future for every resident of Corpus Christi.”

"The GLO is proud to work with Texas communities to strengthen and build infrastructure to protect and improve lives for local residents," Commissioner Buckingham said. "Many of these communities were recently impacted by Hurricane Beryl’s devastating winds and flood waters. Getting and using federal grant funds can be very complicated, but the GLO works side by side with local leaders to push past the federal paperwork and get funds moving forward. Every day, the GLO works on behalf of our fellow Texans to make communities more resilient against future disasters."

The \$15.1 million grant will fund improvements at two of the City’s wastewater treatment plants:

- Flood mitigation measures at the Greenwood Wastewater Treatment Plant
- Installation of emergency generators at both Greenwood and Oso facilities

Today’s presentation celebrates the City’s award alongside 13 additional projects in the Coastal Bend Council of Governments region, representing more than \$135 million in total regional funding.

Questions can be directed to Strategic Business Manager Ashley Marion at 361-546-1111 or email ashleym6@cctexas.com [\(/mailto:ashleym6@cctexas.com\)](mailto:ashleym6@cctexas.com).



Let's Chat

Every Drop Counts, Conserve Corpus Christi.



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**Early Notice and Public Review of a Proposed
Activity in a Federal Flood Risk Management Standard Designated Floodplain**

To: All interested Agencies, Groups, and Individuals

This is to give notice that the City of Corpus Christi under 24 CFR Part 58 has determined that the following proposed action under the Community Development Block Grant (CDBG) Mitigation (MIT) Program, HUD Grant Number 24-065-091-E767 is located in the Federal Flood Risk Management Standard (FFRMS) floodplain, and the City of Corpus Christi will be identifying and evaluating practicable alternatives to locating the action within the floodplain and the potential impacts on the floodplain from the proposed action, as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands. The proposed project location is at 6541 Greenwood Drive in Corpus Christi, Nueces County, Texas. The extent of the FFRMS floodplain was determined using a freeboard value approach.

The project involves mitigation to potential flood damages at the existing Greenwood Wastewater Treatment Plant (WWTP). The project is being done to allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. Under this project, measures are proposed to protect those structures that are most susceptible to flooding inside the plant along with interior drainage system improvements and grading improvements to collect stormwater from the critical areas within the plant that are prone to ponding in and around plant facilities. The major improvements include the following items: site grading, piping and floodway improvements, flood walls for identified plant structures, a new effluent pump station (EPS) of firm capacity up to 36 MGD, and miscellaneous improvements. The project is in the FFRMS floodplain and portions of the flood mitigation improvements will be in a floodway. Approximately one acre of the floodplain will be temporarily impacted, with approximately 0.1 acre of floodway impacts. The impacted floodplain provides the following natural and beneficial functions: flood risk reduction and floodwater storage.

There are three primary purposes for this notice. First, people who may be affected by activities in the FFRMS floodplain and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the FFRMS floodplain, alternative methods to serve the same project purpose, and methods to minimize and mitigate project impacts. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about FFRMS floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in FFRMS floodplains, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Corpus Christi at the following address on or before February 9, 2026:

City of Corpus Christi
Mayor's Office
P.O. Box 9277, Corpus Christi, TX 78469
(361) 826-3100
Attn: Paulette Guajardo, Mayor

A full description of the project may also be reviewed at <https://www.corpuschristitx.gov/department-directory/corpus-christi-water/cdbg-mitigation-funded-projects/>.

Comments may also be submitted via email at Paulette.Guajardo@CorpusChristi.TX.gov.

Date: January 23, 2026

**Aviso Anticipado y Revisión Pública de una Propuesta
Actividad en una Norma Federal de Gestión del Riesgo de Inundaciones Designada como Llanura
de Inundación**

Para: Todas las agencias, grupos e individuos interesados

Se notifica que la Ciudad de Corpus Christi, bajo el 24 CFR Parte 58, ha determinado que la siguiente acción propuesta bajo el Programa de Mitigación (MIT) de Subvención Bloqueada para el Desarrollo Comunitario (CDBG), Subvención HUD número 24-065-091-E767, se encuentra en la llanura de inundación del Estándar Federal de Gestión de Riesgos de Inundaciones (FFRMS), y la Ciudad de Corpus Christi identificará y evaluará alternativas prácticas para ubicar la acción dentro de la llanura de inundación y los posibles impactos en la llanura de inundación derivados de la acción propuesta, según lo exigido por la Orden Ejecutiva 11988, conforme a las regulaciones del HUD en 24 CFR 55.20 en la Subparte C Procedimientos para Tomar Determinaciones sobre la Gestión y Protección de Humedales en Llanura de Inundación. La ubicación propuesta del proyecto es en 6541 Greenwood Drive en Corpus Christi, condado de Nueces, Texas. La extensión de la llanura de inundación FFRMS se determinó mediante un enfoque de valor de francobordo.

El proyecto consiste en mitigar posibles daños por inundación en la actual Planta de Tratamiento de Aguas Wastewater de Greenwood (WWTP). El proyecto se está llevando a cabo para permitir que la planta mantenga la integridad del proceso de tratamiento durante eventos meteorológicos extremos como huracanes y tormentas tropicales. En el marco de este proyecto, se proponen medidas para proteger aquellas estructuras más susceptibles a inundaciones dentro de la planta, junto con mejoras en el sistema de drenaje interior y mejoras en nivelación para recoger aguas pluviales de las áreas críticas dentro de la planta que son propensas a acumularse en y alrededor de las instalaciones de la planta. Las principales mejoras incluyen los siguientes elementos: nivelación del terreno, mejoras en tuberías y canales de inundación, muros de inundación para estructuras de plantas identificadas, una nueva estación de bombeo de efluentes (EPS) con capacidad firme de hasta 36 MGD, y mejoras varias. El proyecto se encuentra en la llanura de inundación del FFRMS y partes de las mejoras de mitigación de inundaciones estarán en un canal de inundación. Aproximadamente una hectárea de la llanura de inundación se verá afectada temporalmente, con aproximadamente 0,1 acres de impactos en la zona de desagüe. La llanura de inundación afectada proporciona las siguientes funciones naturales y beneficiosas: reducción del riesgo de inundación y almacenamiento de agua de inundación.

Este aviso tiene tres propósitos principales. En primer lugar, las personas que puedan verse afectadas por actividades en la llanura de inundación del FFRMS y aquellas que tengan interés en la protección del medio ambiente natural deberían tener la oportunidad de expresar sus preocupaciones y proporcionar información sobre estas áreas. Se anima a los comentaristas a ofrecer sitios alternativos fuera de la llanura de inundación del FFRMS, métodos alternativos para cumplir el mismo propósito del proyecto y métodos para minimizar y mitigar los impactos del proyecto. En segundo lugar, un programa adecuado de aviso público puede ser una herramienta educativa importante para el público en general. La difusión de información y la solicitud de comentarios públicos sobre las llanuras de inundación del FFRMS pueden facilitar y reforzar los esfuerzos federales para reducir los riesgos e impactos asociados a la ocupación y modificación de estas áreas especiales. Tercero, por equidad, cuando el gobierno federal determine que participará en acciones que se lleven a cabo en las llanuras de inundación del FFRMS, debe informar a quienes puedan estar en mayor o continuo riesgo.

Los comentarios escritos deben ser recibidos por la Ciudad de Corpus Christi en la siguiente dirección antes del 9 de febrero de 2026:

City of Corpus Christi
Mayor's Office
P.O. Box 9277, Corpus Christi, TX 78469
(361) 826-3100
Attn: Paulette Guajardo, Mayor

También puede revisarse una descripción completa del proyecto en <https://www.corpuschristitx.gov/department-directory/corpus-christi-water/cdbg-mitigation-funded-projects/>.

Los comentarios también pueden enviarse por correo electrónico en Paulette.Guajardo@CorpusChristi.TX.gov.

Fecha: 23 de enero de 2026

POSTED
2/16/2026 8:41:19 AM
Rebecca Huerta
City Secretary

Final Notice and Public Explanation of a Proposed Activity in a Federal Flood Risk Management Standard (FFRMS) Designated Floodplain

To: All interested Agencies, Groups, and Individuals

This is to give notice that the City of Corpus Christi has conducted an evaluation as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Wetlands Protection. The activity is funded under the Community Development Block Grant (CDBG) Mitigation (MIT) Program, HUD Grant Number 24-065-091-E767. The proposed project(s) is located at 6541 Greenwood Drive in Corpus Christi, Nueces County, Texas and is located in the Federal Flood Risk Management Standard (FFRMS) floodplain. The extent of the FFRMS floodplain was determined using a freeboard value approach.

The project involves mitigation to potential flood damages at the existing Greenwood Wastewater Treatment Plant (WWTP). The project is being done to allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. The project is in the FFRMS floodplain and portions of the flood mitigation improvements will be in a floodway. Approximately one acre of the floodplain will be temporarily impacted, with approximately 0.1 acre of floodway impacts.

The City of Corpus Christi has considered the following alternatives and mitigation measures to minimize adverse impacts and to restore and preserve natural and beneficial functions and intrinsic values of the existing floodplain/wetland: The project must take place in the floodplain because existing WWTP treatment units are located within the floodplain. The City of Corpus Christi considered that the project is occurring at an existing WWTP, which provides service to 64,336 people. Options considered include Option A, "Greenwood WWTP Flood Mitigation & Backup Generators," and Option B, "No Action Alternative,": Under Option A, "Greenwood WWTP Flood Mitigation & Backup Generators," the City of Corpus Christi would complete the project to mitigate potential flood damages to the Greenwood WWTP and allow the plant to maintain integrity of the treatment process during extreme weather events such as hurricanes and tropical storms. Under this option, mitigation measures are proposed to protect those structures that are most susceptible to flooding inside the plant along with interior drainage system improvements and grading improvements to collect stormwater from the critical areas within the plant that are prone to ponding in and around plant facilities. The major improvements include site grading, piping and floodway improvements; flood walls for identified plant structures; a new effluent pump station (EPS) of firm capacity up to 36 MGD; and miscellaneous improvements. The project also includes tasks that will not occur in the floodplain, including installation of emergency generators, installation of instrumentation and an electrical control system for automatic switching between grid power and emergency generators, and miscellaneous improvements related to emergency generators. Under the "No Action Alternative," the City of Corpus Christi would not complete the flood mitigation improvements to the Greenwood WWTP. The "No Action Alternative" was not selected because the WWTP would continue to experience flooding and potentially impact water quality from sanitary sewer overflows. The flood mitigation improvements will comply with the City of Corpus Christi Flood Hazard Prevention Code.

The City of Corpus Christi has reevaluated alternatives to building in the FFRMS floodplain and has determined that it has no practicable alternative to floodplain development. Environmental files documenting compliance with Executive Order 11988, are available for public inspection, review and copying upon request at the times and location delineated in the last paragraph of this notice for receipt of comments.

There are three primary purposes for this notice. First, people who may be affected by activities in the FFRMS floodplain and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about FFRMS floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in FFRMS floodplains, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Corpus Christi at the following address on or before February 24, 2026:

City of Corpus Christi
Mayor's Office
P.O. Box 9277, Corpus Christi, TX 78469
(361) 826-3100
Attn: Paulette Guajardo, Mayor

A full description of the project may also be reviewed from 8:00 a.m. to 5:00 p.m. at 1201 Leopard Street, Corpus Christi, TX 78401 and at <https://www.corpuschristitx.gov/department-directory/corpus-christi-water/cdbg-mitigation-funded-projects/>. Comments may also be submitted via email at Paulette.Guajardo@CorpusChristi.TX.gov.

Date: February 16, 2026

Aviso final y explicación pública de una actividad propuesta en una llanura de inundación designada por la Norma Federal de Gestión del Riesgo de Inundaciones (FFRMS)

Para: Todas las agencias, grupos e individuos interesados

Se notifica que la Ciudad de Corpus Christi ha realizado una evaluación según lo exigido por la Orden Ejecutiva 11988, de acuerdo con las regulaciones del HUD en 24 CFR 55.20 en la Subparte C Procedimientos para Tomar Determinaciones sobre la Gestión de Llanuras de Inundación y la Protección de Humedales. La actividad se financia bajo el Programa de Mitigación (MIT) de Subvención Comunitaria para el Desarrollo Comunitario (CDBG), subvención HUD Número 24-065-091-E767. El(los) proyecto(s) propuesto(s) se encuentra en 6541 Greenwood Drive en Corpus Christi, condado de Nueces, Texas, y se encuentra en la llanura de inundación de la Norma Federal de Gestión del Riesgo de Inundaciones (FFRMS). La extensión de la llanura de inundación FFRMS se determinó mediante un enfoque de valor de francobordo.

El proyecto consiste en mitigar posibles daños por inundación en la actual Planta de Tratamiento de Aguas Wastewater de Greenwood (WWTP). El proyecto se está llevando a cabo para permitir que la planta mantenga la integridad del proceso de tratamiento durante eventos meteorológicos extremos como huracanes y tormentas tropicales. El proyecto se encuentra en la llanura de inundación del FFRMS y partes de las mejoras de mitigación de inundaciones estarán en un canal de inundación. Aproximadamente una hectárea de la llanura de inundación se verá afectada temporalmente, con aproximadamente 0,1 acres de impactos en la zona de desagüe.

La ciudad de Corpus Christi ha considerado las siguientes alternativas y medidas de mitigación para minimizar los impactos adversos y restaurar y preservar las funciones naturales y beneficiosas y los valores intrínsecos de la llanura de inundación/humedal existente: El proyecto debe llevarse a cabo en la llanura de inundación porque las unidades de tratamiento de PMB existentes se encuentran dentro de la llanura de inundación. La ciudad de Corpus Christi consideró que el proyecto se está llevando a cabo en una WWTP existente, que presta servicio a 64,336 personas. Las opciones consideradas incluyen la Opción A, "Mitigación de inundaciones y generadores de respaldo de la WWTP de Greenwood", y la Opción B, "Alternativa sin acción": Bajo la Opción A, "Mitigación de inundaciones y generadores de respaldo de la PMB de Greenwood", la ciudad de Corpus Christi completaría el proyecto para mitigar posibles daños por inundación en la PMB de Greenwood y permitir que la planta mantenga la integridad del proceso de tratamiento durante eventos meteorológicos extremos como huracanes y tormentas tropicales. Bajo esta opción, se proponen medidas de mitigación para proteger aquellas estructuras más susceptibles a inundaciones dentro de la planta, junto con mejoras en el sistema de drenaje interior y mejoras en el nivelamiento para recoger las aguas pluviales de las zonas críticas dentro de la planta que son propensas a acumularse en y alrededor de las instalaciones de la planta. Las mejoras principales incluyen el nivelamiento del terreno, la tuberías y la mejora de la vía de desagüe; muros de inundación para estructuras vegetales identificadas; una nueva estación de bombeo de efluentes (EPS) de capacidad firme de hasta 36 MGD; y mejoras varias. El proyecto también incluye tareas que no se realizarán en la llanura de inundación, como la instalación de generadores de emergencia, la instalación de instrumentación y un sistema de control eléctrico para la conmutación automática entre la energía de la red y los generadores de emergencia, así como mejoras diversas relacionadas con generadores de emergencia. Bajo la "Alternativa de No Acción", la ciudad de Corpus Christi no completó las mejoras de mitigación de inundaciones en la WWTP de Greenwood. La "Alternativa Sin Acción" no fue seleccionada porque la WWTP seguiría sufriendo inundaciones y podría afectar la calidad del agua por desbordamientos

de alcantarillado sanitario. Las mejoras en la mitigación de inundaciones cumplirán con el Código de Prevención de Riesgos de Inundación de la ciudad de Corpus Christi.

La ciudad de Corpus Christi ha reevaluado alternativas a la construcción en la llanura de inundación del FFRMS y ha determinado que no existe una alternativa viable al desarrollo de la llanura de inundación. Los archivos medioambientales que documentan el cumplimiento de la Orden Ejecutiva 11988 están disponibles para inspección pública, revisión y copia previa solicitud, en los horarios y lugares indicados en el último párrafo de este aviso para la recepción de comentarios.

Este aviso tiene tres propósitos principales. En primer lugar, las personas que puedan verse afectadas por actividades en la llanura de inundación del FFRMS y aquellas que tengan interés en la protección del medio ambiente natural deberían tener la oportunidad de expresar sus preocupaciones y proporcionar información sobre estas áreas. En segundo lugar, un programa adecuado de aviso público puede ser una herramienta educativa importante para el público en general. La difusión de información y la solicitud de comentarios públicos sobre las llanuras de inundación del FFRMS pueden facilitar y reforzar los esfuerzos federales para reducir los riesgos e impactos asociados a la ocupación y modificación de estas áreas especiales. Tercero, por equidad, cuando el gobierno federal determine que participará en acciones que se lleven a cabo en las llanuras de inundación del FFRMS, debe informar a quienes puedan estar en mayor o continuo riesgo.

Los comentarios escritos deben ser recibidos por la Ciudad de Corpus Christi en la siguiente dirección a fecha del 24 de febrero de 2026 o antes:

City of Corpus Christi
Mayor's Office
P.O. Box 9277, Corpus Christi, TX 78469
(361) 826-3100
Attn: Paulette Guajardo, Mayor

También puede revisarse una descripción completa del proyecto de 8:00 a.m. a 5:00 p.m. en 1201 Leopard Street, Corpus Christi, TX 78401 y en <https://www.corpuschristitx.gov/department-directory/corpus-christi-water/cdbq-mitigation-funded-projects/>. Los comentarios también pueden enviarse por correo electrónico en Paulette.Guajardo@CorpusChristi.TX.gov.

Fecha: 16 de febrero de 2026