



CERTIFICATION PROPOSAL

WASTEWATER COLLECTION SYSTEM FOR VINTON, TEXAS

Revised: November 11, 2019



CONTENTS

EXECUTIVE SUMMARY	1
1. PROJECT OBJECTIVE AND EXPECTED OUTCOMES	3
2. ELIGIBILITY	3
2.1. Project Type and Description	3
2.2. Project Location.....	3
2.3. Project Sponsor and Legal Authority.....	4
3. CERTIFICATION CRITERIA	4
3.1. Technical Criteria	4
3.1.1. General Community Profile	4
3.1.2. Project Scope	6
3.1.3. Technical Feasibility.....	8
3.1.4. Land Acquisition and Right-of-Way Requirements	9
3.1.5. Project Milestones.....	9
3.1.6. Management and Operation.....	10
3.2. Environmental Criteria	10
3.2.1. Environmental and Health Effects/Impacts	10
A. Existing Conditions	10
B. Project Impacts.....	11
3.2.2. Compliance with Applicable Environmental Laws and Regulations.....	12
A. Environmental Clearance	13
B. Mitigation Measures	13
C. Pending Environmental Tasks and Authorizations.....	14
3.3. Financial Criteria.....	14
4. PUBLIC ACCESS TO INFORMATION	15
4.1. Public Consultation.....	15
4.2. Outreach Activities	16
5. RECOMMENDATION	17

EXECUTIVE SUMMARY

WASTEWATER COLLECTION SYSTEM FOR VINTON, TEXAS

- Project:** The proposed project consists of the construction of a wastewater collection system to provide first-time service to residents in the Village of Vinton, Texas (the “Project”). The new system includes the installation of trunk and lateral sewer lines, a local lift station and force main, a regional lift station, residential connections, and the decommissioning of existing residential on-site systems.
- Project Objective:** The purpose of the Project is to reduce the human health risks associated with waterborne diseases and the potential for groundwater contamination related to exposure to untreated wastewater, by providing first-time access to wastewater collection infrastructure in unserved areas.
- Expected Outcomes:** The project is expected to generate environmental and human health benefits related to the following outcomes:
- Provide first-time access to wastewater collection services for 506 existing homes, including the installation of household connections;¹
 - Prevent the risk of groundwater contamination by decommissioning 506 on-site wastewater disposal systems; and
 - Eliminate discharges of 275,000 gallons per day (gpd) of untreated or inadequately treated wastewater from residential, commercial and industrial sources.²
- Population to Benefit:** 2,043 residents of Vinton, Texas.
- Project Sponsor:** The Village of Vinton, Texas.
- Estimated Construction Cost:** US\$19,731,500.

¹. The number of connections is based on residences identified in the field during the design phase.

² Source: Engineering Feasibility Report. Estimate based on 2017 census estimate of 2,043 residents and 75 gal/capita/day of wastewater discharges, resulting in 153,225 gpd from residential sources and 121,600 gpd from commercial sources. (https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml?src=bkmmk, accessed June 20, 2018).

NADB Grant: US\$3,000,000 grant from the Border Environment Infrastructure Fund (BEIF) funded by the U.S. Environmental Protection Agency (EPA).

Uses and Sources of Funds:
(US\$)

Uses	Amount	%
Construction*	\$ 16,601,500	84.1
Construction management	930,000	4.7
Lift station capacity buy-in	2,200,000	11.2
TOTAL	\$ 19,731,500	100.0
Sources	Amount	%
Texas Water Development Board (TWDB) Grant	\$ 11,646,500	59.0
TWDB Loan	5,085,000	25.8
NADB-BEIF (EPA grant)	3,000,000	15.2
TOTAL	\$ 19,731,500	100.0

* Estimated construction cost includes contingencies.

Project Status:

Key Milestones	Status
Environmental clearance – U.S.	Completed
Final design	Completed
Procurement - TWDB	Initiated in 4th quarter of 2019
Procurement - BEIF	Anticipated in 3rd quarter of 2020
Construction period	Estimated period of 24 months

CERTIFICATION PROPOSAL

WASTEWATER COLLECTION SYSTEM FOR VINTON, TEXAS

1. PROJECT OBJECTIVE AND EXPECTED OUTCOMES

The proposed project consists of the construction of a wastewater collection system in the Village of Vinton, Texas (the “Project”). The purpose of the Project is to reduce the human health risks associated with waterborne diseases and the potential for groundwater contamination related to exposure to untreated wastewater discharges, by providing first-time access to wastewater collection infrastructure for 506 homes. The new sewer system will collect and convey nearly 275,000 gallons per day of sewage to the John T Hickerson Wastewater Treatment Plant (WWTP), which is operated by El Paso Water (EPW). The Project includes the installation of household connections and the decommissioning of existing on-site systems.

2. ELIGIBILITY

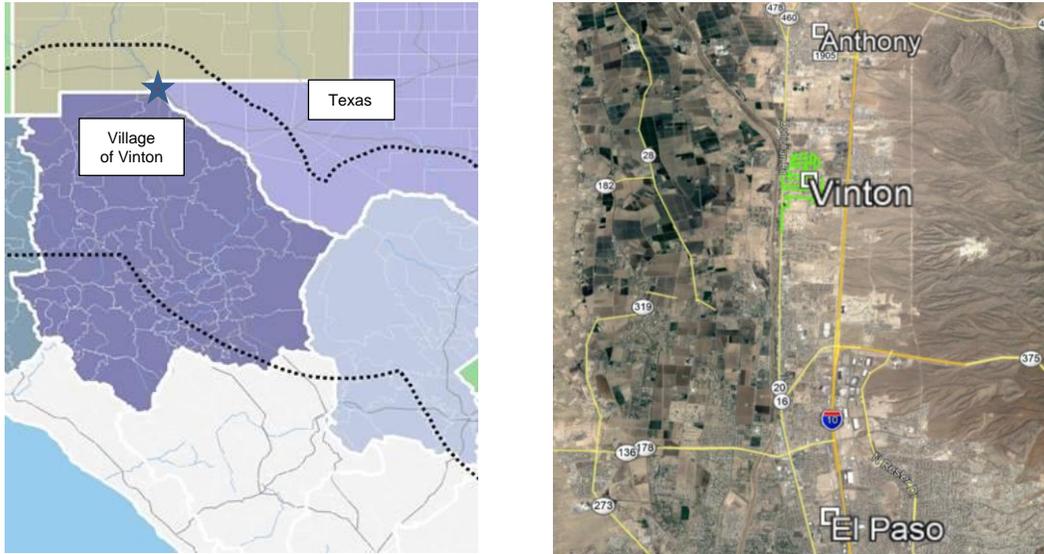
2.1. Project Type and Description

The Project falls within the eligible category of wastewater collection and treatment.

2.2. Project Location

The Project is located in the Village of Vinton in El Paso County, Texas, approximately 12 miles from the U.S.-Mexico border and well within the border region defined as 62 miles north of this international border. Its geographical coordinates are Latitude 31° 57' 30" N and Longitude 106° 35' 50" W, at an approximate mean elevation of 3,850 ft. Figure 1 shows the location of the community and of the Project.

Figure 1
PROJECT LOCATION MAP



2.3. Project Sponsor and Legal Authority

The public-sector Project sponsor is the Village of Vinton, which is responsible for providing services within the village boundaries. As a municipality, Vinton does not need a Certificate of Convenience and Necessity (CCN) from the Texas Commission on Environmental Quality (TCEQ) to provide services.³ In accordance with Chapter 13, Section 13.042, of the Texas Water Code, “...the governing body of each municipality has exclusive original jurisdiction over all water and sewer utility rates, operations, and services provided by a water and sewer utility within its corporate limits.”

3. CERTIFICATION CRITERIA

3.1. Technical Criteria

3.1.1. General Community Profile

Vinton is a bedroom community to the city of El Paso, located approximately 25 miles north of downtown El Paso on U.S. Interstate Highway I-10. Many residents commute to El Paso for employment opportunities. However, the village has been able to capitalize on its proximity to El Paso and the international border, as well as its easy access to Interstate 10, to attract manufacturing companies, such as Vinton Steel.

³ A Certificate of Convenience and Necessity (CCN) gives the holder the exclusive right to provide retail water and/or sewer utility services to an identified geographic area.

According to the U.S. census estimates for 2017, the population of Vinton is 2,043. The village is considered an economically-distressed community with a median household income (MHI) of US\$32,986, and 39.8% of the its population lives in poverty. In comparison, median household income of the state of Texas is US\$54,727, and 15.6% of the state population lives below poverty level.⁴

The following table summarizes the status of public services and infrastructure in Vinton.

Table 1
BASIC PUBLIC SERVICES AND INFRASTRUCTURE

Water¹	
Coverage:	20%
Water supply source:	El Paso Water
Number of hookups:	161
Wastewater Collection and Treatment²	
Coverage:	No service (failing on-site systems)
Number of connections:	0
Solid Waste³	
Solid waste collection:	100%
Final disposal:	Landfill

¹ Most residents use private wells or private water companies producing poor water quality. The Village of Vinton is working with NADB on a proposal for a new water system in parallel to this Project. More details provided in the next section.

² The proposed Project will provide new wastewater collection service to 90% of households in Vinton. Wastewater collected from the community will be treated at the John T Hickerson Wastewater Treatment Plant operated by EPW.

³ Source: Information provided by the Village of Vinton on May 15, 2018.

Local Water and Wastewater System

Currently, Vinton’s residents and businesses use on-site wastewater disposal systems, such septic tanks, and there are also a few cesspools. These on-site systems were officially designated as a nuisance in 2009, as described in a letter from El Paso County Judge Anthony Cabos, which states that *“the County of El Paso, through its On-Site Sewage Facilities Department, which is the enforcing agency in El Paso County, deems there exists a nuisance to public health and safety in the Village of Vinton caused by illegal cesspools and septic tanks that have been modified against the model subdivision rules.”* Conditions have not improved since 2009, and a few residents have been cited for failing on-site systems. Citations are typically issued for inadequate maintenance, failing systems, cesspools or connecting multiple dwellings to one septic system.

⁴ Source: <https://www.census.gov/search-results.html?q=village+of+vinton+texas&page=1&stateGeo=none&searchtype=web&cssp=SERP>, accessed June 20, 2018.

Because of these conditions, the Project was selected to receive grant funding from the Project Development Assistance Program (PDAP) and Border Environmental Infrastructure Fund (BEIF), which are both funded by the U.S. Environmental Protection Agency (EPA) and managed by NADB. The Project will address the nuisance conditions, as described in the letter from the El Paso County Judge.

The Project will connect to and be operated as part of the EPW wastewater system. The Village of Vinton will own the collection system infrastructure, including a local lift station; however, EPW will operate and maintain the system through an interlocal agreement similar to those used for several other adjacent communities.

Additionally, adequate drinking water service is only available to a small portion (20%) of community. While many residents have access to service from a private water company or a private on-site well, the water produced by those systems does not meeting water quality standards for human consumption. NADB is working with the Project Sponsor to address these critical drinking water needs. A separate drinking water project, to be funded by the U.S. Department of Agriculture-Rural Utility Services and a BEIF grant, is scheduled to be submitted to the Board for certification prior to the end of 2019. The new water system infrastructure will be owned by Vinton; however, it will be maintained and operated by EPW.

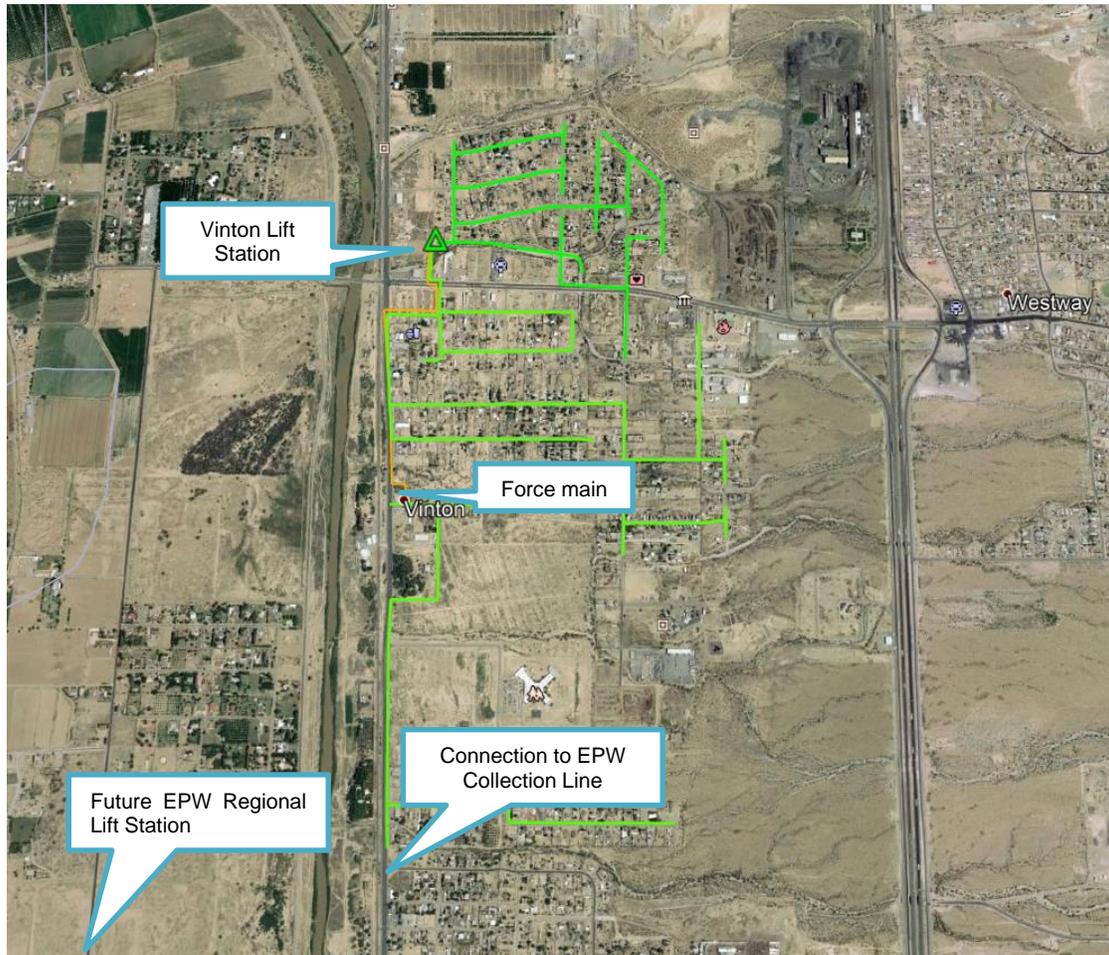
3.1.2. Project Scope

The Project consists of constructing a wastewater collection system for the Village of Vinton and includes the following components:

- *New wastewater collection system*: Activities include the installation of approximately 55,100 linear feet of 8- and 12-inch polyvinyl chloride (PVC) pipe and 4,200 linear feet of force main, as well as the construction of a lift station, north of Vinton Road. This project component will be paid for by the Texas Water Development Board (TWDB).
- *Wastewater connections and decommissioning of on-site systems*: Activities include installing 506 residential connections from the homes to the new sewer system and decommissioning the existing septic systems. This project component will be covered by the BEIF grant.

Figure 2 provides a schematic layout of the collection system infrastructure.

Figure 2
WASTEWATER COLLECTION SYSTEM LAYOUT



A regional lift station will be built and owned by EPW in parallel with the construction of the Vinton wastewater collection system. EPW has assessed the cost of the capacity reserved for conveying the wastewater flows generated by Vinton from this lift station to the EPW collection and treatment system. The lift station buy-in cost will be covered by TWDB. This lift station will provide regional benefits, as it will allow services to be extended to other neighboring communities such as: Mayfair, Nuway, Serene Acres, and Ponderosa Estates, in the future. The wastewater from Vinton will discharge to an EPW collection line and be routed to the John T Hickerson WWTP.

As a result of this Project, 90% of the community will be connected to the sewer system. Areas not covered by this Project are north of a natural arroyo and include an industrial area along Chicken Farm Road. Challenges in designing an arroyo crossing, various land ownership issues, and the low density of residential connections in the area, have made it unfeasible to provide services at this time.

3.1.3. Technical Feasibility

An Engineering Feasibility Report was completed for the Project in January 2012 and revised in 2017.⁵ It included an analysis of alternatives to select the appropriate technology for Vinton. Three potential alignments for the wastewater lines were considered in detail, along with the no-action alternative.

The Engineering Feasibility Report also considered the construction of a WWTP for Vinton, but this option was quickly rejected since a new plant would require a significantly larger capital investment and have higher operation and maintenance (O&M) costs, face significant regulatory and permitting hurdles, and require the Village to commit to developing and maintaining human resources for operation of the facilities. In contrast, connecting to a new regional lift station and existing treatment facilities owned and operated by EPW addresses those operational and regulatory concerns. Moreover, EPW's treatment has sufficient capacity to handle Vinton's needs, even after the town is fully built out.

The no-action alternative was rejected, since it fails to address the contamination and health risks created by aging and failing on-site systems. Furthermore, issues with failing septic systems will be exacerbated by the planned water distribution project, since improved access to drinking water typically increases residential usage.

After determining that a wastewater collection system connected to the EPW system was the most viable option, three different alignments for wastewater collection were examined using the following criteria:

- Constructability
- Capital costs
- O&M costs
- Environmental impact
- Social/community acceptance
- Topography
- Rights of way and easement requirements
- Pavement removal and replacement

All three alternatives had similar recommendations for the lateral collection lines; the primary difference was the alignment of the trunk line. Options included running the trunk line on either the east or west side of Doniphan Road or moving the trunk line to the corridor used by El Paso Electric. All of the options had similar issues regarding capital investment, community acceptance, trench depth, dewatering and constructability. Ultimately, the Sponsor selected the alignment that provided the best access for maintenance, had fewer conflicts with other utilities and required fewer easements.

⁵ Engineering Feasibility Report, Village of Vinton, Texas, Wastewater Collection System, January 2012. Amended Engineering Feasibility Report, Village of Vinton, Texas, Wastewater Collection System, May 2017.

Project design was based on El Paso Water design criteria, which meet or exceed TCEQ standards. The design criteria provide guidelines for manholes, pipe sizes, depths, slopes in gravity lines, allowable materials, service connections, etc. EPW will provide O&M services for the system and reviewed the design to ensure that it meets EPW requirements. The gravity line will be constructed from 8- and 12-inch diameter PVC pipe, and will provide sufficient capacity to meet current and future demand in Vinton.

3.1.4. Land Acquisition and Right-of-Way Requirements

This Project will be constructed within public rights of way, purchased land and acquired easements. Most of the lateral lines will be constructed in existing residential roadways owned by the Village of Vinton. The new Vinton Lift Station will be construction on a 1.8-acre site owned by the Village. In general, the private easements were obtained to facilitate construction by staying out of the roadway and, in some areas, to help minimize trench depths.

No additional land or right-of-way acquisition is pending.

3.1.5. Project Milestones

A facility plan and an Environmental Information Document were completed for the Project in 2012; however, the Project was delayed due to a lack of consensus on the Village Council regarding the funding structure to implement the Project. Once this issue was resolved, the documents were updated in May 2017, and EPA issued a positive environmental ruling on April 23, 2018. Design has also been completed.

Bidding for construction of the collection system funded by TWDB is expected to be completed by the end of the first quarter of 2020. Because the BEIF grant will support the cost of installing connections and decommissioning on-site wastewater systems, procurement will begin after the new collection infrastructure has been approved to receive wastewater flows, which is anticipated in the third quarter of 2020. The construction of the entire project is expected to take approximately 24 months. Issues that could affect the construction schedule are related to procurement, weather and delivery of construction materials.

Table 2 provides a summary of the Project milestones and their respective status.

Table 2
PROJECT MILESTONES

Key Milestones	Status
Environmental clearance – U.S.	Completed
Final design	Completed
Procurement - TWDB	Initiated in 4th quarter of 2019
Procurement - BEIF	Anticipated in 3rd quarter of 2020
Construction period	Estimated period of 24 months

3.1.6. Management and Operation

The Village of Vinton has never owned or operated a water or wastewater system. Upon Project completion, the wastewater collection system will be owned by the Village but operated and maintained by EPW through an interlocal agreement. EPW is the largest utility in the region and has well-developed institutional capacity, including departments dedicated to operation and maintenance, engineering and new project development. EPW provides water services to over 200,000 metered connections and to approximately 195,000 wastewater customers.

Additionally, EPW has a high level of institutional capacity as evidenced by its successful operation of sophisticated water and wastewater systems. Its water system includes treatment plants to remove arsenic and to desalinate groundwater, in addition to two plants for treating surface water. Its wastewater system includes four WWTPs with a total capacity of 96.2 mgd. Vinton's wastewater will be treated at the John T Hickerson WWTP, which has the capacity to treat 17.5 mgd and currently treats approximately 9 mgd. Initially, the Village will generate an estimated 275,000 gallons/day of wastewater; at complete build-out the community could generate nearly 500,000 gallons/day. The Hickerson plant has sufficient capacity to handle all existing and potential flows from Vinton, and the total estimated capacity has been reserved.

EPW currently has a variety of service agreements in the area, ranging from providing strictly bulk water supply services to operating community systems, as will be the case in Vinton. Through interlocal agreements with other utilities—such as the Lower Valley Water District, Colonia Revolution, Paseo del Este Municipal Utility District and El Paso County East Montana System—EPW is indirectly responsible for providing services to approximately 24,500 water hookups and nearly 19,000 wastewater connections outside the city limits.

3.2. Environmental Criteria

3.2.1. Environmental and Health Effects/Impacts

A. Existing Conditions

Currently, residents of Vinton do not have access to wastewater collection and treatment services. The Village residents use on-site wastewater disposal systems, such as septic tanks, to manage their wastewater needs. Most homes are on half-acre lots, which is the minimum lot size allowed under TCEQ regulations (TCEQ §285.4.1) for this type of on-site infrastructure. However, some properties do not meet this requirement, and in some cases, there are multiple dwellings on the same lot, which does not allow sufficient space for adequate drainage. Some residents have received citations for failing systems, most likely attributed to substandard design, poor soil conditions and the shallow groundwater table. In 2009, El Paso County issued a Nuisance Order to the Village due to the poor operational status of many septic tanks and the existence of cesspools. Typical issues associated with the failing systems include strong odors, surface pooling and overflows triggered by storm events. Surface pooling and overflows are the most worrisome because of the increased risk for human contact with wastewater.

Since the original Nuisance Order was issued, conditions have continued to deteriorate, leaving homeowners at risk of being fined and/or have other legal action taken by El Paso County. A Health Impact Assessment (HIA) Survey of Vinton completed in 2014 confirmed that 40% of the on-site systems inspected are not functioning properly, as evidenced by odors, saturated spots in the yard and standing water. Moreover, many residents did not even know the location of their septic tank. The adequate separation of septic systems from the source of drinking water is also a concern in Vinton, since many residents use private wells located near substandard on-site wastewater disposal systems. El Paso County has not taken actions beyond warnings, since the Village has been working on this Project to provide its residents with access to a centralized system.

Overflows and surface pooling of wastewater pose a risk for transmission of waterborne diseases associated with pathogenic microorganisms found in wastewater and unsafe water supplies. An individual may become ill after drinking water that has been contaminated with these organisms, eating uncooked foods that have been in contact with contaminated water, or through poor hygiene habits that contribute to the dissemination of diseases by direct or indirect human contact. Table 3 shows waterborne disease statistics for El Paso County, Texas.

Table 3
WATERBORNE DISEASE STATISTICS FOR EI PASO COUNTY, TEXAS

Disease	Number of Cases/Year				
	2012	2013	2014	2015	2016
Intestinal Amoebiasis	1	4	1	4	3
Campylobacteriosis	45	51	58	71	63
Cryptosporidiosis	2	1	3	2	3
Shigellosis	60	31	23	24	39

Source: Texas Health and Human Services Automated Epidemiological Surveillance System, accessed May 9, 2019 (<https://www.dshs.texas.gov/idcu/default.shtm>).

Although waterborne disease statistics specific to Vinton are not available, the HIA study of the community provides evidence that health issues in Vinton are especially acute. The study compared rates of self-reported intestinal issues and diarrhea in Vinton with those of the neighboring community of Westway, which has water and wastewater services. The study found that the respective rates of intestinal maladies and diarrhea were six and eight times higher in Vinton than in Westway.

B. Project Impacts

The Project will help protect the health of residents and the local aquifer by collecting the wastewater generated in Vinton for proper treatment and decommissioning existing septic systems. The wastewater will be conveyed to the Hickerson WWTP for treatment, a facility with a solid record of meeting all regulatory requirements. After treatment, a portion of the effluent from the plant is used as reclaimed water, which reduces demand on fresh water sources and the remainder is discharged to the Rio Grande, which helps support its ecosystems.

Specifically, the Project is expected to generate environmental and human health benefits related to the following outcomes:

- Provide first-time access to wastewater collection services for 506 existing homes, including the installation of household connections;⁶
- Prevent the risk of groundwater contamination by decommissioning 506 on-site wastewater disposal systems; and
- Eliminate discharges of 275,000 gpd of untreated or inadequately treated wastewater from residential, commercial and industrial sources.⁷

To enhance the benefits of the Project, planning and final design considered all reasonable applications of green building practices, as defined by the EPA Border Water Infrastructure Program. Most of the wastewater collection infrastructure will be a gravity flow system, and the lift station will be equipped with high efficiency pumps. Moreover, by using an existing WWTP, there is no need to increase the use of energy and other resources for treatment operations.

C. Transboundary Impacts

Since Vinton is located approximately 12 miles from the U.S.-Mexico border, impacts from the Project are not likely to be readily detected in Mexico; however, the Project will support regional efforts to protect and maintain the Hueco-Mesilla Bolson Aquifer, which is the main aquifer serving El Paso and Ciudad Juarez.

Upon Project completion, treated wastewater from Vinton will be discharged to the Rio Grande. The volume of water discharged to the river will increase slightly as a result of this Project. Overall, the transboundary impacts of this Project will be negligible.

No other transboundary impacts are anticipated as a result of the Project.

3.2.2. Compliance with Applicable Environmental Laws and Regulations

Since the Project will be receiving federal funds, it is subject to the National Environmental Policy Act (NEPA) environmental clearance process (42 USC §§4321-4370f). To be eligible for funding from the U.S.-Mexico Border Water Infrastructure Program, all projects must obtain a Finding of No Significant Impact (FONSI). EPA Region 6 completed the environmental review and clearance process for this Project, in accordance with the regulations of the NEPA Council on Environmental Quality (Title 40 CFR §§1500.1-1508.28) and with EPA NEPA regulations (40 C.F.R. Part 6).

The proposed wastewater collection system in the Village of Vinton complies with all design criteria for wastewater infrastructure provided by El Paso Water and TCEQ. In addition, the

⁶ The number of connections is based on residences identified in the field during the design phase.

⁷ Source: Engineering Feasibility Report. Estimate based on 2017 census estimate of 2,043 residents and 75 gal/capita/day of wastewater, resulting in 153,225 gpd from residential sources and 121,600 gpd from commercial sources. (https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml?src=bkmm, accessed June 20, 2018).

collected wastewater will be treated by El Paso Water at the John T Hickerson WWTP, which will continue to comply with its existing discharge permit, as issued by TCEQ. Standards established in the TCEQ permit comply with the following applicable U.S. standards and regulations:

- Clean Water Act (CWA), the primary law in the United States regulating discharges from public wastewater systems.
- National Pollutant Discharge Elimination System (NPDES), used by EPA to set minimum standards for the discharge of all treated wastewater.

A. Environmental Clearance

In compliance with NEPA, an Environment Information Document (EID) was developed. The EID addresses environment impacts resulting from the implementation of the project. Specific areas addressed in the NEPA process include:

- Air quality, odors, and greenhouse gas emissions
- Noise impacts
- Water quality, hydrology, and floodplain impacts
- Impacts to biological resources and wetlands
- Impacts to cultural and historical resources
- Impacts to the geology and soils
- Impacts to municipal and public services
- Public health, hazards, and waste management
- Socioeconomic conditions
- Land use and planning
- Transportation and circulation
- Utilities and service systems, and
- Environmental justice

Based on the findings and conclusions of the EID, EPA Region 6 prepared an Environmental Assessment (EA) and a FONSI. A 30-day public comment period for the environmental study began on March 22, 2018. On April 23, 2018, EPA issued a FONSI resolution, establishing that the Project will not result in any significant negative impacts to the environment the U.S.-Mexico border area.

B. Mitigation Measures

Although Project implementation will have no significant adverse impacts on the environment, mitigation measures have been established to address temporary and minor impacts during Project construction and operation. As described in the Evaluation Assessment, the construction activities may cause the following disturbances:

- Noise levels are likely to be elevated during construction activities; however, this impact is short term and will be concentrated in the work area.
- A temporary increase in soil erosion and dust emissions may be experienced due to construction.

- Surface water resources could be temporarily impacted by storm water runoff during the construction phase.
- The local air basin is not expected to be significantly altered due to the short-term nature of the construction activities and the limited number of vehicles and construction equipment used.

Typical mitigation measures to be implemented include:

- Application of water to reduce the emission of dust particles and soil erosion;
- Construction will normally occur between 8 a.m. and 5 p.m. to avoid extended noise disruption.
- Vehicle tune-ups to reduce emissions and noise effects;
- Placement of warning signs to prevent potentially hazardous situations;
- Hay bales or silt fences may be placed along rights of way to avoid contaminants to surface water resources;
- All construction personnel will attend a briefing to describe potential impacts of construction activities to familiarize workers with mitigation measures.

By following best management practices as described in the Environmental Assessment, the temporary impacts due to construction will be minimized. Moreover, the long-term results from the implementation of the proposed Project will be positive overall. The Environmental Assessment identified benefits to surface and groundwater, as well as positive impacts related to social justice issues.

C. Pending Environmental Tasks and Authorizations

There are no environmental authorizations pending.

3.3. Financial Criteria

The total estimated cost of the Project is US\$19,731,500, which includes construction, supervision, lift station capacity buy-in and contingencies. The Sponsor requested a BEIF grant to support the implementation of the Project. Based on a thorough analysis of both the Project and the Sponsor, NADB has determined that the Project meets all BEIF program criteria and is recommending that the EPA approve a BEIF grant for up to US\$3,000,000 for its construction.

Table 4 shows a breakdown of the uses and sources of funding.

Table 4
USES AND SOURCES OF FUNDS
 (US \$)

Uses	Amount	%
Construction*	\$ 16,601,500	84.1
Construction management	930,000	4.7
Lift station buy-in	2,200,000	11.2
TOTAL	\$ 19,731,500	100.0
Sources	Amount	%
TWDB grant	\$ 11,646,500	59.0
TWDB loan	5,085,000	25.8
NADB-BEIF (EPA grant)	3,000,000	15.2
TOTAL	\$ 19,731,500	100.0

* Estimated construction costs include contingencies.

The cost of building the sewer system will be financed by a loan and grant from TWDB, which together represent close to 85% of the total cost of the Project. The BEIF grant will cover the remaining 15% of the construction costs and will be used to fund the installation of sewer connections and the decommissioning of on-site sanitary systems.

4. PUBLIC ACCESS TO INFORMATION

4.1. Public Consultation

NADB published the draft certification proposal for a 30-day public comment period beginning October 11, 2019. The following Project documentation is available upon request:

- Final Design for Village of Vinton Centralized Wastewater Collection System, Phases I and II, 2019;
- Engineering Feasibility Report, Village of Vinton, Texas – Wastewater Collection System, January 2012;
- Amendment to Engineering Feasibility Report, Village of Vinton Texas – Wastewater Collection System, May 2017;
- Environmental Information Document, Village of Vinton Proposed Wastewater Improvements, October 2012;
- Amendment to Environmental Information Document, Village of Vinton Proposed Wastewater Improvements, July 2017; and
- Environmental Assessment and Finding of No Significant Impact for the Village of Vinton Wastewater Collection Project Vinton, El Paso County, Texas, April 23, 2018.

The 30-day public comment period ended on November 10, 2019, with no comments received.

4.2. Outreach Activities

The Village conducted extensive outreach efforts to communicate the characteristics of the Project, including cost and fees, and to obtain the support of residents in the Project area. In accordance with the public outreach requirements of the BEIF program, activities such as the use of a local steering committee, public meetings and adequate access to project information were conducted as described in the Public Participation Plan (PPP).

The Local Steering Committee was established on May 16, 2017, and included 11 members of the community, as well as a technical support group consisting of Village staff and the project engineers. The steering committee developed a PPP and periodically met with the Project team to help the utility to disseminate information regarding the Project. The Project's technical and financial information was made available to the public for review. The information disseminated included a fact sheet, and two public meetings were held where information about the Project was presented.

The notice for the first public meeting was published on December 7, 2017, in *The West Texas County Courier* (local newspaper). The meeting was held on January 9, 2018, at Vinton City Hall, and fulfilled the public participation requirements of the NEPA process, as well as gave local residents the opportunity to learn more about the Project, ask questions and voice their support or opposition to the Project. Based on the sign-in sheet, the meeting was attended by six people who showed interest in the implementation of the proposed Project.

A second meeting was held on September 3, 2019, and included a presentation describing the Project, its benefits, anticipated construction impacts and potential financial impacts. The presentation was made as part of a regular town council meeting. No opposition to the Project from meeting attendees was detected, and council members expressed general support for the Project.

In addition to local outreach activities, a public comment process was conducted in relation to the publication of the environmental clearance finding on March 22, 2018.

NADB also conducted a media search to identify potential public opinion about the Project. References to the Project were found on the websites listed below:

- *CBS 4 News* (October 5, 2017): The video segment and article announce the award of US\$270,000 from the EPA-funded Project Development Assistance Program (PDAP) to support the development of a drinking water project in Vinton. They also describe the current condition of on-site sanitary disposal systems and the proposed wastewater collection project for Vinton.
<https://cbs4local.com/news/local/village-of-vinton-reaches-another-wastewater-milestone>

- *KFOX News* (February 22, 2017): This report provides background on the Project dating back to 2012, when three members of Vinton's council effectively blocked its development without providing the reasons for their opposition. The article also provides a discussion of community support for the Project, and the limited options for recall efforts at that time.
<https://kfoxtv.com/news/local/vinton-could-have-had-water-and-sewer-by-now-a-look-back-at-what-went-wrong>
- *KFOX News* (June 29, 2016): The report describes the funding the Project received from the Texas Water Development Board (TWDB) for Project design. The condition of Vinton's on-site sanitary systems is also described.
<https://kfoxtv.com/news/local/finances-for-sewer-system-in-village-of-vinton-received>
- *KFOX News* (March 3, 2016): The article describes the grant from TWDB to support development of the designs for the wastewater collection system.
<https://kfoxtv.com/news/local/financial-assistance-for-wastewater-system-approved-for-town-of-vinton>
- *KFOX News* (August 18, 2015): Interviews with area residents and descriptions of existing conditions in Vinton are provided, along with the community efforts to obtain funds through various programs.
<https://kfoxtv.com/archive/pipe-dreams-how-a-tiny-texas-town-is-worlds-apart-from-el-paso>

The activities carried out by the Project Sponsor and the media coverage identified above demonstrate that the public received updates related to the Project, including its technical aspects, environmental effects, disruptions from construction, funding structure and financial impacts. The Project Sponsor informed NADB that significant support for the Project was received during the public outreach process.

5. RECOMMENDATION

Certification Criteria Compliance

The Project falls within the eligible sector of wastewater collection and treatment and is located within the border region, as required under the NADB Charter. The 30-day public comment period ended on November 10, 2019, with no comments received. The project review performed by the NADB Chief Environmental Officer confirms that the Project complies with all the certification requirements, and there are no pending activities required for compliance.

Funding Criteria Compliance

The Project Sponsor applied for funding through the U.S.-Mexico Border Program FY11/12 prioritization process and was selected to receive technical assistance through the Project Development Assistance Program (PDAP) and construction assistance through the Border

**BOARD DOCUMENT BD 2019-15
CERTIFICATION PROPOSAL
VINTON, TEXAS**

Environment Infrastructure Fund (BEIF). The project meets all BEIF program criteria, and EPA has approved a BEIF grant for up to US\$3,000,000 for project construction.

Accordingly, based on the foregoing conclusions as supported and presented in detail in this certification and financing proposal, NADB hereby recommends certification of the Project.