Finding of No Significant Impact

MEMORANDUM FOR THE PROJECT FILE

SUBJECT: Environmental Impact Determination and Necessary Environmental Findings for Water System and Sanitary Sewer Improvements, City of Minden, Pottawattamie County, Iowa, EDA #ED25DEN0G0266, NEPA ID EA-006-06-DRO-1758617238

An environmental assessment has been prepared for the subject project and is attached. After reviewing the assessment and supporting materials, I find that for the following reasons the project will not significantly affect the quality of the human environment.

- The project is a Class II Action as defined by EDA Directive 17.02-2.
- Both the individual and cumulative impacts will not be significant.
- No unique or unusual environmental conditions exist which would be adversely affected by the project.
- The project will not exceed two or more indicators of significance.
- The project is compatible with local land use plans, zoning restrictions, and the Comprehensive Economic Development Strategy (CEDS).
- The Agency policy with respect to Executive Orders 11988, Floodplain Management, and 11990, Wetlands Protection, has been met because the project will not impact either the values or functions of a floodplain or wetland.
- No known cultural resources will be impacted by the project.
- Project design will mitigate identified construction impacts.
- The pre-approval requirements of EDA Directive 17.02-7 are met.
- No negative comments have been received through the state or regional clearinghouse processes, and federal public notice process.

An environmental assessment has been prepared for the subject project and is attached. For the above reasons, and with the inclusion of the attached Specific Conditions, preparation of an environmental impact statement is not required.

Name Angela Martinez

Title Regional Director

Date _____

Signature ANGELA MARTINEZ Digitally signed by ANGELA MARTINEZ Date: 2026.03.20 13:24:03 -06'00'

Specific Conditions

MIGRATORY BIRD TREATY ACT: To ensure ground-disturbing activities do not result in "take" of an active nest or migratory bird protected under the Migratory Bird Treaty Act, schedule all vegetation removal, trimming, and grading of vegetated areas outside of the peak bird breeding season to the maximum extent practicable. When project activities cannot occur outside the bird nesting season, conduct surveys prior to scheduled activity to determine if active nests are present within the area of impact and buffer any nesting locations found during surveys. Generally, the surveys should be conducted no more than five days prior to scheduled activity.

ARCHAEOLOGICAL AND HISTORICAL RESOURCES: If during construction of the project, historical and archaeological resources, including burial grounds and artifacts are discovered, the Recipient shall immediately stop construction in the area, contact the applicable State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO), interested Tribes, and EDA, and follow the SHPO or THPO instructions for the preservation of resources.

PROTECTION OF SURFACE WATER RESOURCES: The project shall employ best management practices (BMPs) during construction to prevent any runoff from entering nearby and adjacent wetlands and waterways.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT: Prior to solicitation of bids, the Recipient shall provide documentation satisfactory to EDA that the National Pollutant Discharge Elimination System permit has been obtained or that the bid documents include language requiring the contractor to obtain the permit prior to the start of construction. If the contractor obtains the permit, then prior to initial disbursement of funds by EDA for construction activities, the Recipient shall provide documentation satisfactory to EDA that the permit has been obtained.

ECONOMIC DEVELOPMENT ADMINISTRATION
SEATTLE REGIONAL OFFICE
ENVIRONMENTAL ASSESSMENT

DATE: November 18, 2025

PROJECT: Water System and Sanitary Sewer Improvements

APPLICANT: City of Minden, Iowa

PROJECT NUMBER: ED25DEN0G0266

NEPA ID: EA-006-06-DRO-1758617238

A. PROJECT DESCRIPTION

1. BENEFICIARIES

The City of Minden (City) is the primary beneficiary of the proposed project. Completion of the project would provide the necessary infrastructure to attract businesses to the community.

2. PROPOSED CONSTRUCTION

The City of Minden, Pottawattamie County, Iowa, would construct a 340 foot well with pitless units and adapter. A pitless unit replaces an above-ground well housing and well pits, improving sanitation, convenience, frost protection, and security. Welded to the well casing underground, the pitless unit safely redirects water below the frost line. Construction activities include the installation of a submersible pump and column; pipe/discharge piping; discharge vault, including meter/piping/valves; and associated electrical and controls. All testing, well development, civil site work and appurtenances would be completed for a functioning well.

In addition to the well, the project would include the construction of a new water treatment facility to replace the facility damaged by the 2024 storms which, if federal funding is obtained, could be a connected action to the EDA-funded components; a new six-inch water line (4,400 linear feet (LF)) with connection to the existing six-inch distribution system; abandonment of the three-inch raw water line; construction of a new eight-inch sanitary sewer line (1,200 LF); sanitary sewer services (200 LF); and 84 vertical feet (VF) of 54-inch sanitary manholes (Appendix A).

3. PURPOSE AND NEED

The purpose of this project is to construct a new water well, water line, and sanitary sewer main to improve the capacity of the systems. These projects are needed to meet firm capacity of the water and sanitary sewer systems and distribution improvements. These

projects would replace and improve existing utility infrastructure to meet the needs of the City and attract businesses to the community.

4. ALTERNATIVES TO THE PROPOSED PROJECT

Alternatives to the proposed action include No Action and utilizing existing Well No. 2.

Alternative One - No Action

The No Action alternative would leave the existing infrastructure as is and the water system below the firm capacity. This alternative is not feasible because it does not meet the current and long-term needs of the community.

Alternative Two – Existing Well No. 2

This alternative would connect existing Well No. 2 to a three-inch water line that runs to the existing water treatment plant that was destroyed by the April 2024 natural disaster event. This alternative would run a new four-inch line from the proposed well adjacent to the existing three-inch line to the new water treatment plant site 500 feet northeast of the existing water treatment plant site.

As existing Well No. 2 and the proposed well are located at the same site, the preferred action was deemed cost effective as both wells would run through a single six-inch line that would connect to the existing distribution system and route raw water to the treatment plant.

Summary

Neither of the proposed alternatives were found to be environmentally superior to the proposed project. The No Action Alternative would not address current adverse environmental impacts due to inadequate water and sewer capacity nor help the City rebuild after a natural disaster, expanding the economic base and resulting job creation. Utilizing just the existing Well No. 2 instead of adding a second well under the preferred action would have no discernable environmental benefits and limits the resiliency of the overall project.

It is concluded that the preferred alternative does not represent significantly greater environmental impacts than other potential or feasible alternatives and therefore is acceptable.

B. HISTORIC/ARCHAEOLOGICAL RESOURCES

A formal Phase 1 archeological survey was conducted in March 2025. The primary objective of this Phase I investigation was to identify and delineate cultural resources within the proposed project area. The survey included areas outside the scope of this proposed project.

Phase I Archaeological Investigation, Tallgrass Archaeology LLC, March 2025

Tallgrass Archaeology LLC of Iowa City, Iowa, conducted a Phase I Intensive Archaeological Investigation for the proposed construction of a water treatment facility, water line and well, along with a sewer line replacement, and townhomes construction project in Minden, Iowa.

Record Search

The pre-field archaeological records search for the project area consisted of a check of the I-Sites Pro, an online GIS and database of Iowa archaeology maintained online by the Office of the State Archaeologist (OSA). The site records search was performed to locate any previously recorded archaeological sites within a 1-mile (1.6 km) radius of the project areas and examine all available professional reports and literature applicable to the project area. Historical plats and atlases were also consulted to evaluate historic site potential. Historical and modern aerial photographs and LiDAR images were also examined on the Iowa Geographic Map Server maintained by Iowa State University.

Research conducted in I-Sites Pro showed that no previous archaeological surveys had overlapped with the current project areas. Five other surveys have been conducted outside of - but within a mile of - the project area (I-Sites Pro 2025). These surveys were conducted in preparation for projects involving utility modifications and road improvements. No previously identified archaeological sites overlap with the current project area or were recorded within a mile of it.

Field Investigation

The field investigation was conducted between March 10th - 14th, 2025. The project area is in Sections 15 of T77N-R41W, Minden Township, Pottawattamie County, Iowa.

The archaeological survey area consisted of five specific areas designated A - E (Appendix B). Area C, the location of proposed townhomes, and Area D, the location of the proposed water treatment facility, are not part of the EDA-funded project. The water treatment plant may become a connected action due to the potential for federal funding and is discussed separately in this section.

- **Area A** is the location of the proposed supply well. This section is square in shape with a short access road and is located southwest of the intersection of Westgate Road and 335th St. in northwest Minden.
- **Area B** is the proposed corridor for a new water main. This proposed watermain begins along the east side of 335th Street and runs north before turning east along the south side of the Minden Township Cemetery. The proposed waterline then turns to the south for roughly 106 meters before turning back east running for 330 meters then turning south for roughly 370 meters before terminating in a residential neighborhood at Meadow Lane in northern Minden.
- **Area E** is the proposed corridor for a sewer line. This sewer line is expected to run along the east side of Main Street at the intersection of Main and 5th Street southwest to the intersection of Main and 340th Street.

A pedestrian survey was conducted at 3-to-15-meter intervals in areas with high surface visibility. Most of the high surface visibility areas were within agricultural fields in Areas A and B of the project area. Systematic subsurface tests examined areas with low ground surface visibility and were used to record representative soil profiles within the project areas. Subsurface sampling utilized shovels and 20-centimeter diameter Seymour augers. All tests were excavated into sterile subsoil. Field investigators analyzed and recorded representative soil profiles of subsurface tests, with soil colors described using standard Munsell soil color charts. The excavated sediments from each

test were screened through a 0.6-centimeter (0.25-inch) hardware cloth at approximately 10-centimeter (4-inch) vertical increments. All tests were backfilled upon completion.

Investigation Results Areas A, B, and E

Area A: Area A was subject to both pedestrian survey and subsurface testing. No cultural deposits were identified during subsurface testing of the agricultural field in Area A. Soil profiles within the agricultural field showed clear disturbance due to agricultural practices.

The access road within Area A contained surface visibility under 25 percent and was surveyed by 15-meter interval subsurface testing. A single prehistoric site (13PW403) was identified.

Archaeological Site 13PW403

The site consists of a single prehistoric lithic flake. This artifact was a small tertiary flake. The site is bounded by negative tests around the positive test in intervals less than 10 meters. No intact cultural deposits, subsurface features, or topographic anomalies were discovered during the Phase I investigation.

Site 13PW403 is recommended to be considered not eligible for the National Register of Historic Places (NRHP). No additional archaeological work is recommended for the site.

Area B: Area B was subjected to both pedestrian survey and subsurface testing. Most of this project area was a harvested corn field. Like Area A, the agricultural field showed clear disturbance due to agricultural practices. No archaeological sites were identified during pedestrian survey within Area B.

Subsurface Testing within Area B was conducted on a manicured lawn south of the Minden Township Cemetery. A total of eight subsurface tests were excavated. No cultural material was encountered, and there was no indication that the Minden Township Cemetery extended into the project area.

The portion of Area B which runs north along 335th Street is located within a disturbed ditch which contains numerous utilities; thus, subsurface testing was not feasible.

Area E: Area E was subject to pedestrian survey along with the excavation of six Oakfield probe cores. Area E mainly ran along the eastern edge of Main Street and as such, several utilities were noted within portions of the area. The pedestrian survey did not identify any archaeological sites though significant disturbance within this portion of the project area was identified. Area E was extensively damaged because of the April 2024 tornado and recent reconstruction efforts have greatly impacted the location. Oakfield probes confirmed this disturbance. Had archaeological deposits been present within Area E they would have been significantly impacted, and no integrity would remain.

Summary and Recommendations

The three areas that make up the scope of the EDA-funded project (five areas comprise the overall project area) have been subjected to various disturbances which have degraded the overall integrity of the entire project area. Portions of Areas A and B have

been disturbed through agricultural practices such as plowing, while Area E has been impacted through urban development such as building construction and utility installation.

Despite the significant disturbance to the project area, a single prehistoric site was identified within Area A and designated Site 13PW403. The site was found to lack integrity, cultural features, diagnostic artifacts, and the artifact density necessary to answer pertinent research questions. As such, 13PW403 is recommended to be considered not eligible for listing on the NRHP. No further Phase I archaeological investigation is recommended by Tallgrass Archaeology (*Phase I Archaeological Investigation for the Construction of a New Water Treatment Facility, A New Municipal Supply Well, a Raw Water Transmission Main, Replacement of a Sanitary Sewer, and Construction of a New Set of Townhomes Project, Minden, Iowa*, Tallgrass Archaeology LLC, March 2025).

Consultations

The EDA initiated consultation with the Iowa State Historic Preservation Officer (SHPO) to comply with Section 106 of the National Historic Preservation Act of 1966 (as amended) and its implementing regulation at 36 CFR Part 800. A letter was submitted via the portal on August 7th, 2025. SHPO responded via email on September 5th, 2025, concurring with the determination of No Adverse Effect.

EDA sent initial consultation letters to all tribes identified by the TDAT database as having ancestral ties to the project area. Letters were sent via email on August 7th, 2025. EDA received no response from any of the Tribes contacted.

Consultation documents are included in Appendix B.

Area D: Proposed Water Treatment Plant (WTP)

Area D is the location of the proposed water treatment facility. This area is situated to the east of Main Street and is currently the location of the Minden Municipal Yard Waste dumping ground. Area D was subject to both pedestrian survey and the excavation of six subsurface tests. No archaeological sites were identified within the area based on the pedestrian survey and subsurface tests.

C. AFFECTED ENVIRONMENT

1. AFFECTED AREA

The project area is comprised of rolling hills and flat bottomlands. The land use is a mix of row crops, residential housing, commercial areas, urban rights-of-way, and developed and undeveloped urban areas. (Appendix C).

The project area lacks any native vegetation, woodlands, or undisturbed areas. The project would not result in the loss of any residential or commercial homes or structures. Water lines and sanitary lines would follow existing utility corridors throughout much of the project area and new utility runs would not impact current land use. The project area is free of state, national, or community parks or areas of public interest. Less than one-half acre of farmed land would be converted to a well pad and access road.

There are no Wilderness Areas as designated or proposed under the Wilderness Act, or wild or scenic rivers as designated or proposed under the Wild and Scenic Rivers Act located on or in the vicinity of the proposed project activities.

2. COASTAL ZONES

There are no impacts to shorelines, beaches, dunes, or estuaries from implementation of this project.

3. WETLANDS

The U.S. Army Corps of Engineers (USACE) has regulatory authority for activities within wetlands under the Clean Water Act (CWA, 1977, as amended), which serves as the primary federal law protecting the quality of the nation's surface waters. Section 404 of the CWA establishes a program to regulate discharge of dredged or fill material into "waters of the United States," which is administered by the USACE. The term "waters" includes wetlands and non-wetland bodies of water that meet specific criteria as defined in the Code of Federal Regulations. In general, a permit must be obtained under Section 404 of the CWA before fill can be placed in wetlands or other waters of the U.S. The type of permit depends on the amount of acreage and the purpose of the proposed fill, subject to the discretion of the USACE. Under Section 404, general permits may be issued on a nationwide, regional, or state basis for particular types of activities that will have only minimal adverse impacts. Individual permits are required for projects with potentially significant impacts.

A formal wetland delineation has not been completed for this project. No mapped National Wetland Inventory (NWI) wetlands or potential wetlands were identified from a desktop review (Appendix D). The project area lacks direct connectivity to traditional navigable waters or tributaries of traditional navigable waters, and it is unlikely that wetlands found within a delineation would qualify as Waters of the United States.

There are no significant impacts to wetlands, nor would any U.S. Army Corps of Engineers (USACE) permit be required for project implementation.

Proposed Water Treatment Plant (WTP)

According to the NWI database, there are now wetlands on the proposed project site. Keg Creek and associated wetlands are located to the southeast (Appendix D).

4. FLOODPLAINS

Flood zones are geographic areas that the Federal Emergency Management Administration (FEMA) has defined according to varying levels of flood risk. These zones are depicted on a community's Flood Insurance Rate Map (FIRM) or Flood Hazard Boundary Map. Each zone reflects the severity or type of flooding in the area.

The new sanitary sewer line is not located within the floodplain although it is close (Appendix E). However, the proposed new water treatment facility is partly located within the floodplain according to the FIRMette dated October 6, 2024.

Water Treatment Plant (WTP)

The City of Minden intends to apply for assistance with the USDA-RD Emergency Community Water Assistance Grants to cover the cost of construction of the new water

treatment plant (WTP). The WTP would be located at 520 Main Street, a parcel of land owned by the City that is currently used for landscaping waste disposal. An adjacent parcel to the west would be purchased by the City to accommodate the size of the new WTP. This is considered a critical action for the agency per RD Instruction 1970-F, 1970.255 (h)(5).

The proposed new WTP is located within FEMA Special Flood Hazard Area (SFHA) Zone AE (Appendix E), which is an "area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year" (FEMA Flood Zone glossary). Anticipated project activities within Zone AE include minimal grading and crushed rock for the access road down to the existing well to accommodate for the grade of the new water treatment facility.

The proposed design would impact a very small portion of the floodplain to allow for minimal grading to occur to the access road. The structure would be protected from flood hazards with elevations of at least three feet above the established 100-year floodplain elevation. The additional grading for the existing access road down to the well would be graded to accommodate the new grades. Fabric would be laid down, and new crushed rock surface installed. This area of anticipated impact to the floodplain is very small and would not reduce floodwater storage.

To comply with Executive Order-11988 Floodplain Management, the 8-Step Process of Alternatives Considerations has been conducted by the City for the USDA Rural Energy for America Program (Appendix E). According to the City's engineering firm, the WTP project is currently awaiting final obligation by FEMA.

5. EXTREME WEATHER

Extreme weather events are occurrences of unusually severe weather or climate conditions that can cause devastating impacts on communities and agricultural and natural ecosystems. Weather-related extreme events are often short-lived and include heat waves, freezes, heavy downpours, tornadoes, tropical cyclones and floods.

Pottawattamie County has some risk for extreme weather conditions stemming from excessive heat (relatively moderate), drought (relatively moderate), and flooding (relatively moderate) (Appendix F). The proposed project is not expected to be adversely affected by these events.

6. FEDERALLY LISTED SPECIES

The US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) database was queried on September 22, 2025, for special status species that may occur in or near the project area. The following threatened, endangered, and candidate species were included in the species list generated for the proposed project and may be present at its location or may be affected by it.

Table 1: Species Potentially Affected by the Proposed Project

Common Name	Scientific Name	ESA Listing Status	Critical Habitat
Birds			
Piping Plover	*Charadrius melodus*	Threatened	Final – does not overlap with project site

Common Name	Scientific Name	ESA Listing Status	Critical Habitat
Insects			
Monarch Butterfly	*Danaus plexippus*	Proposed Threatened	Proposed – does not overlap with project site
Suckley's Cuckoo Bumble Bee	*Bombus suckleyi*	Proposed Endangered	None
Flowering Plants			
Western Prairie Fringed Orchid	*Platanthera praeclara*	Threatened	None

There are no critical habitats within the project area under the jurisdiction of the USFWS Illinois-Iowa Ecological Services Field Office. There are no refuges or fish hatcheries within the project area.

Based upon the lack of habitat in the project area for the federally listed species as well as the lack of federal designated critical habitat in the project area, there would be "no effect" to federally listed species (Appendix G).

7. LAND USE AND ZONING

Land used for the proposed project is zoned residential or agricultural. Lands not subject to the Farmland Protection Policy Act (FPPA) include lands within incorporated city limits. A portion of the water mains and all sanitary sewer lines are within the city limits. The well would be in agricultural land just outside Minden city limits (Appendix H).

A Natural Resources Conservation Service (NRCS) soils report was generated for the proposed project site. The map indicates that soils present in the project area consist of the following types:

- Ida silt loam, 5 to 9 percent slopes, severely eroded (1C3)
- Ida silt loam, 9 to 14 percent slopes, severely eroded (1D3)
- Ida silt loam, 14 to 20 percent slopes, severely eroded (1E3)
- Monona silt loam, 2 to 5 percent slopes (10B)
- Monona silt loam, 5 to 9 percent slopes, eroded (10C2)
- Monona silt loam, 9 to 14 percent slopes (10D)
- Monona silt loam, 9 to 14 percent slopes, eroded (10D2)
- Monona silt loam, 14 to 20 percent slopes (10E)
- Napier silt loam, 2 to 5 percent slopes (12B)
- Napier silt loam, 5 to 9 percent slopes (12C)
- Dow silt loam, 9 to 14 percent slopes, severely eroded (22D3)

Farmland Classification for Monoma silt loam, 2 to 5 percent slopes (10B) and Napier silt loam, 2 to 5 percent slopes (12B) is *All areas are prime farmland*; the other soil types are classified as *Prime farmland of statewide importance* (Appendix H).

Because the proposed project is mostly within city limits, no prime or unique agricultural lands would be significantly impacted. This project is consistent with local land use zoning.

8. SOLID WASTE MANAGEMENT

The proposed project and project facilities would not generate solid waste. There are no significant impacts to solid waste management from the implementation of the project.

9. HAZARDOUS OR TOXIC SUBSTANCES

The proposed project would not produce, use, or distribute hazardous or toxic substances. There are no significant impacts from hazardous or toxic substances from the implementation of the project.

10. WATER RESOURCES

Surface waters in the area include:

- Unnamed pond, approximately 0.6 miles Southwest of the well site
- Keg Creek, which runs on the Eastern side of Minden and discharges to the Missouri River approximately 38 miles South of the City
- Mosquito Creek, which is 20 miles West of the City and discharges to the Missouri River approximately 25 miles South of the City

Keg Creek and Mosquito Creek are listed under USEPA Section 303(d) as impaired or threatened (Appendix I). There would be discharges of stormwater during construction to unnamed ditches and drainageways with eventual deposition in Keg Creek. An NPDES General Permit #2 will be required for the construction of the project. This permit will be applied for before construction and will address mitigation for Keg Creek. Robust sediment controls would be used to capture sediment on-site.

Underground water resources in the area include:

- Dakota Aquifer
- Mississippian Aquifer
- Silurian-Devonian Aquifer
- Cambrian-Ordovician Aquifer

This project involves the drilling of 340 foot deep well that will draw water from the Dakota Aquifer for use as city drinking water. The Dakota Aquifer is not in overdraft or adjudicated.

The project is not within an area mapped by the EPA as sole source aquifer recharge area. The proposed project is not served by a well. The construction area would be restored to existing grades so no changes to surface water patterns would occur.

There are no significant impacts to water resources from the proposed project.

11. WATER SUPPLY AND DISTRIBUTION SYSTEMS

Prior to the tornado disaster, the water treatment plant provided an average of 42,500 gallons per day (with a maximum of 167,500 gallons) of potable water to 600 community residents and 30 commercial users. The water treatment plant was destroyed by the tornado, so the City brought in a temporary water treatment skid that is providing approximately the same capacity, but lower quality water. The existing well pumping capacity is 100 gallons per minute, but according to plant operators, the well is struggling to provide that amount. The proposed new well would provide an increase in capacity to

about 150 – 200 gallons per minute (Appendix J). The new water treatment plant is designed to meet all requirements of the Safe Drinking Water Act.

EPA requires community water systems to deliver a Consumer Confidence Report, also known as an annual drinking water quality report, to their customers. A report from 2023 was available for the City's water supply. It showed no violations (Appendix J).

12. WASTEWATER COLLECTION AND TREATMENT FACILITIES

Wastewater is routed to a three-cell continuous discharge stabilization lagoon system to the south of the city (Appendix K). Wastewater flows or loading are not expected to change due to this project. The system is designed to treat:

- An average dry weather (ADW) flow of 0.1120 million gallons per day (MGD)
- An average wet weather (AWW) flow of 0.1230 MGD
- A maximum wet weather (MWW) flow of 0.2456 MGD
- A design 5-day biochemical oxygen demand (BOD_5) load of 115 lbs./day.
- A design Total Suspended Solids (TSS) load of 135 lbs./day.

There are no significant impacts from the proposed project to wastewater collection and treatment facilities.

13. TRANSPORTATION (Streets, Parking and Traffic)

The proposed project would have no permanent impact on transportation. Temporary impacts to traffic and parking will occur during construction.

There are no significant impacts to traffic patterns after completion of the proposed project. No new traffic patterns would be created, and the project would have minimal impacts on existing traffic.

14. AIR QUALITY

Under the Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) establishes primary and secondary air quality standards. Primary air quality standards protect the public health, including the health of "sensitive populations, such as people with asthma, children, and older adults." Secondary air quality standards protect public welfare by promoting ecosystem health, preventing decreased visibility, and damage to crops and buildings. EPA has set national ambient air quality standards (NAAQS) for the following six criteria pollutants: Ozone (O_3), Carbon Monoxide (CO), Nitrogen Dioxide (NO_2), Sulfur Dioxide (SO_2), Particulate Matter (PM_{10}), and Particulate Matter ($PM_{2.5}$).

The proposed project would have no impact on current or future air quality. There are no anticipated primary beneficiaries that will increase emissions, odors, or greenhouse gas emissions. There may be temporary increase in dust during the construction phase of the project.

There are no significant impacts to air quality from project implementation. The project would not result in a cumulatively considerable net increase of a criteria pollutant under applicable federal or state ambient air quality standards.

15. NOISE POLLUTION

The proposed project would not result in an increase in ambient noise levels. There may be a temporary increase in noise during the construction phase of the project. Construction noise would be intermittent, varying in the type, amount, and location of activities conducted.

There are no significant impacts to noise in and around the project area due to construction and implementation of the project.

16. PERMITS

The overall construction site will require an NPDES General Permit #2 through the Iowa Department of Natural Resources (IADNR). This will be applied for shortly before construction. The sanitary sewer permit schedules have been submitted and approved by the IADNR. The well and water mains permit schedules have been submitted to the IADNR and are awaiting final approval (Appendix L).

The well required the following permit schedules for the IADNR:

- Schedule 1a - General Information
- Schedule 1c - Fee Calculation
- Schedule 3a - Water System Preliminary Data
- Schedule 3b - Source Information
- Schedule 3c - Water Quality Data
- Schedule 4 - Well Site Survey
- Schedule 5b – Well Appurtenances

The water mains required the following permit schedules for the IADNR:

- Schedule 1a – General Information
- Schedule 1c – Fee Calculation
- Schedule 2a – Water Mains

The sanitary sewer required the following permit schedules for the IADNR:

- Schedule A – General Information
- Schedule B – Collection System

No other permits are expected to be needed.

17. PUBLIC NOTIFICATION/CONTROVERSY

The NEPA notice was published in the Paper of Record, The Daily Nonpareil. The Daily Nonpareil published the notice on August 9, 12, and 14, 2025 (Appendix M).

The SRO Regional Environmental Officer received no comments pertaining to the proposed project since the NEPA notice was published. There is no known controversy about the proposed project.

The City of Minden has been working to rebuild since the spring tornadoes. An online community survey shows strong support for ongoing recovery efforts, and Facebook

engagement shows the same. The community has been kept apprised of ongoing efforts through updates on the City's website.

To date, the City has not received any negative feedback on its various efforts.

18. REASONABLY FORESEEABLE EFFECTS

The proposed project would result in a small conversion of farmland for the well pad and access road. The proposed project would result in a temporary increase in noise and dust due to construction.

Part of the proposed new water treatment plant (WTP) would be located within a Zone AE Floodplain according to the National Flood Hazard Layer Flood Insurance Rate Map (FIRMette) from the Federal Emergency Management Agency (FEMA) dated October 6th, 2024. Activities within the Zone AE floodplain include minimal grading and the placement of crushed rock for the access road down to the existing well to accommodate for the grade of the new WTP.

D. MITIGATION

The EDA-funded proposed project would not result in impacts that require mitigation.

The potential impact to the existing floodplain from the construction of the new WTP was determined to be minimal. Facilities would be constructed primarily outside of the floodplain and proposed structures and improvements are designed to be three feet above the 100-year flood plain elevation. The additional grading to the existing access road to bring it up to the elevation of the proposed facility and protect it to three feet above the 100-year floodplain will be the only work taking place within the floodplain. The work will be designed to have minimal impact.

Pottawattamie County may require the City to obtain a floodplain permit prior to construction.

VI. CONCLUSION

The project is not controversial or major in scope and does not appear to have the potential to create significant effect on the quality of the human environment. An impact statement is not considered necessary. Review of all available data and completion of this Environmental Assessment has resulted in concluding a Finding of No Significant Impact (FONSI) on the Environment. In my opinion, the approval of this project would not violate the following:

1. National Environmental Policy Act of 1969, as amended
2. American Indian Religious Freedom Act
3. The Archeological and Historic Preservation Act of 1974
4. The Clean Air Act, as amended
5. The Clean Water Act, as amended
6. Coastal Barrier Resources Act
7. Coastal Zone Management Act, as amended
8. Community Environmental Response Facilitation Act of 1992
9. Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended
10. Endangered Species Act, as amended

11. Environmental Quality Improvement Act of 1970, as amended
12. Executive Order 11514, Protection and Enhancement of Environmental Quality, as amended
13. Executive Order 11593, Protection and Enhancement of the Cultural Environment
14. Executive Order 11988, Floodplain Management
15. Executive Order 11990, Protection of Wetlands
16. Executive Order 12088, Federal Compliance with Pollution Control Standards
17. Executive Order 12372, Intergovernmental review of Federal Programs, as amended
18. Farmland Protection Policy Act
19. Fish and Wildlife Coordination Act
20. Marine Protection, Research and Sanctuaries Act of 1972, as amended
21. Marine Sanctuaries Amendments of 1984, as amended
22. The National Historic Preservation Act of 1966, as amended
23. Noise Control Act of 1972, as amended
24. Pollution Prevention Act of 1990
25. Resource Conservation and Recovery Act of 1976, as amended
26. The Safe Drinking Water Act
27. Superfund Amendments and Reauthorization Act of 1986
28. Toxic Substances Control Act, as amended
29. The Wild and Scenic Rivers Act, as amended

SPECIFIC CONDITIONS: To assure mitigation of potential environmental impacts, mitigation measures are used in the form of grant conditions. The following Specific Conditions are recommended for placement on the Grant Agreement as an addendum to the General Terms and Conditions:

- **MIGRATORY BIRD TREATY ACT:** To ensure ground-disturbing activities do not result in "take" of an active nest or migratory bird protected under the Migratory Bird Treaty Act, schedule all vegetation removal, trimming, and grading of vegetated areas outside of the peak bird breeding season to the maximum extent practicable. When project activities cannot occur outside the bird nesting season, conduct surveys prior to scheduled activity to determine if active nests are present within the area of impact and buffer any nesting locations found during surveys. Generally, the surveys should be conducted no more than five days prior to scheduled activity.

- **HISTORIC AND ARCHAEOLOGICAL RESOURCES:** If during construction of the project, historical and archaeological resources, including burial grounds and artifacts are discovered, the Recipient shall immediately stop construction in the area, contact the applicable State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO), interested Tribes, and EDA, and follow the SHPO or THPO instructions for the preservation of resources.

- **PROTECTION OF SURFACE WATER RESOURCES:** The project shall employ best management practices (BMPs) during construction to prevent any runoff from entering nearby and adjacent wetlands and waterways.

- **NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT:** Prior to solicitation of bids, the Recipient shall provide documentation satisfactory to EDA that the National Pollutant Discharge Elimination System permit has been obtained or that the bid documents include language requiring the contractor to obtain the permit prior to the start of construction. If the contractor obtains the permit, then prior to initial disbursement of funds by EDA for construction activities, the Recipient shall provide documentation satisfactory to EDA that the permit has been obtained.

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Date: 2025.11.18 08:06:27 -08'00'

PREPARED BY:

Rowena DeFato Seattle Regional Environmental Officer

REFERENCES

Department of Commerce, Economic Development Administration Directive 17.01, EDA Program to Reduce the Risk of Hazardous Waste Liability, March 18, 1998.

Department of Commerce, Economic Development Administration Directive 17.02-2 EDA Program to Implement the National Environmental Policy Act of 1969 and Other Federal Environmental Mandates as Required. October 14, 1992.

Executive Order 11990 Protection of Wetlands, 42 F.R 26961 May 24, 1977.

Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, February 11, 1994.

Phase I Archaeological Investigation for the Construction of a New Water Treatment Facility, a New Municipal Supply Well, a Raw Water Transmission Main, Replacement of a Sanitary Sewer, and Construction of a New Set of Townhomes Project, Minden, Iowa; prepared for Eagle Engineering, by Tallgrass Archaeology LLC, March 2025 (Report No. TA25-996).

Compliance with Executive Order-11988 Floodplain Management, 8-Step Process of Alternatives Considerations, City of Minden Water Treatment Plant, Rural Energy for America Program (REAP).

EXHIBIT VI-A

FIGURES, CORRESPONDENCE AND OTHER MATERIALS SUBMITTED BY APPLICANT AND OTHER PARTIES TO SUPPORT ENVIRONMENTAL ASSESSMENT

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

APPENDIX G

APPENDIX H

APPENDIX I

APPENDIX J

APPENDIX K

APPENDIX L

APPENDIX M