CERTIFICATION PROPOSAL

DRINKING WATER DISTRIBUTION SYSTEM FOR VINTON, TEXAS

Submitted: January 22, 2020

CONTENTS

EXECUTIVE SUMMARY

DRINKING WATER DISTRIBUTION SYSTEM FOR VINTON, TEXAS

Project: The proposed project consists of the construction of a drinking water distribution system in the Village of Vinton, Texas (the "Project"). The new system will include the installation of water distribution lines, residential meters and a regional storage tank. Drinking water will be supplied by El Paso Water.

Project Objective: The purpose of the Project is to provide reliable and sustainable drinking water service and thus reduce the human health risks associated with waterborne diseases by replacing the current substandard small water systems new distribution infrastructure and access to a fully compliant water source.

Expected Outcomes: The Project is expected to generate environmental and human health benefits related to the following outcomes:

- Increase access to safe and reliable drinking water services for 367 households;
- Eliminate exposure to arsenic and pathogenic organisms that have been identified in the existing water sources.[1]
- Provide regional benefits through the construction of a storage tank that will serve Vinton and surrounding small communities.

Population to Benefit: 1,480 residents of Vinton, Texas.[2]

Project Sponsor: The Village of Vinton, Texas.

Estimated Construction Cost: US$10,618,500.

NADB Grant: US$3,500,000 grant from the Border Environment Infrastructure Fund (BEIF) funded by the U.S. Environmental Protection Agency (EPA).

[1] The Texas Commission on Environmental Quality (TCEQ) has issued administrative orders against the existing providers for issues related to arsenic violations.
[2] Estimate based on 367 residential connections with an average of 4.04 persons per household.

Uses and Sources of Funds:
(US$)

Uses	Amount	%
Construction Phase I*	$ 4,760,500	44.8
Construction Phase II*	3,500,000	33.0
Storage tank buy-in	1,610,000	15.2
Private system buy-out	748,000	7.0
TOTAL	**$ 10,618,500**	**100.0**

Sources	Amount	%
U.S. Department of Agriculture (USDA) grant	$ 4,760,500	44.8
USDA loan	2,358,000	22.2
NADB-BEIF (EPA grant)	3,500,000	33.0
TOTAL	**$ 10,618,500**	**100.0**

* Estimated construction cost includes contingencies and supervision.

Project Status:

Key Milestones	Status
Environmental clearance	Completed
Final design	Completed
Procurement – Phase I	Initiated fourth quarter 2019
Procurement – Phase II	Initiate second quarter 2020
Construction period	Estimated period of 24 months

CERTIFICATION PROPOSAL

DRINKING WATER DISTRIBUTION SYSTEM FOR VINTON, TEXAS

1. PROJECT OBJECTIVE AND EXPECTED OUTCOMES

The proposed project consists of the construction of a drinking water distribution system in the Village of Vinton, Texas (the "Project"). The purpose of the Project is to provide reliable and sustainable drinking water service and thus reduce the human health risks associated with waterborne diseases, by replacing the small, substandard water systems currently in use with new distribution infrastructure and access to a fully compliant water source for 367 homes. The Project will eliminate exposure to arsenic and pathogenic organisms present in the current water supply.

2. ELIGIBILITY

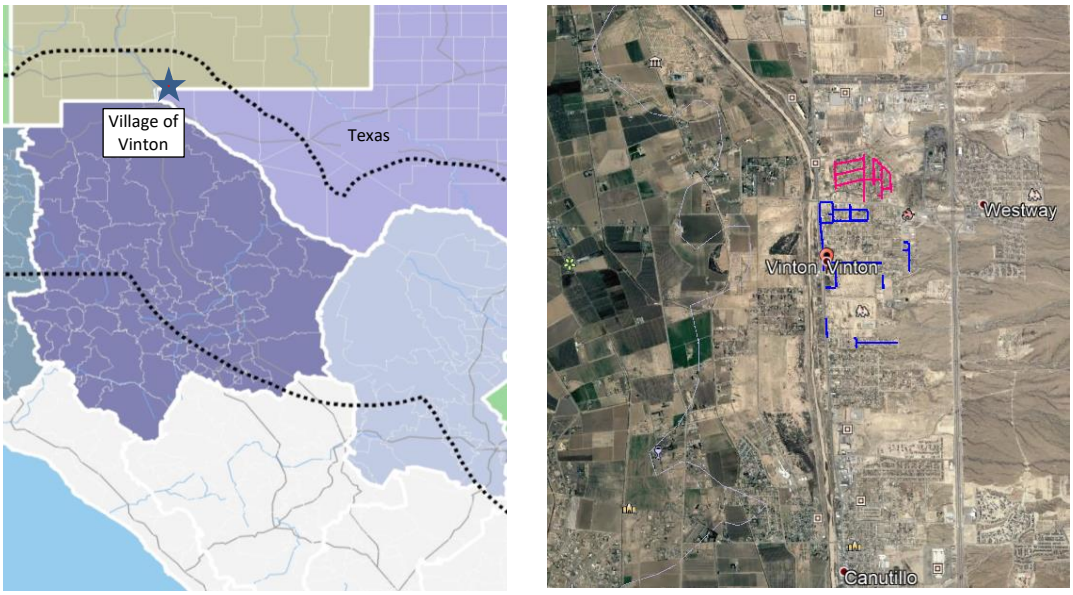
2.1. Project Type

The Project falls within the eligible category of drinking water.

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 31^0 57' 30'' N and Longitude 106^0 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

[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.

Paso and the international border, as well as its easy access to Interstate 10, to attract manufacturing companies, such as Vinton Steel.

According to 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, the median household income for 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

Water*	
Coverage:	30%
Water supply source:	El Paso Water
Number of hookups:	139 residential / 30 commercial
Wastewater Collection and Treatment**	
Coverage:	No service (failing on-site systems)
Number of connections:	0
Solid Waste***	
Solid waste collection:	100%
Final disposal:	Landfill

* Most residents use private wells or private water companies that produce poor water quality. The proposed Project will provide service to 90% of households in Vinton.
** A project for a new wastewater collection system serving 506 households in Vinton was certified in November 2019. Wastewater collected from the community will be treated at the John T Hickerson Wastewater Treatment Plant operated by El Paso Water (EPW).
*** Source: Information provided by the Village of Vinton on May 15, 2018.

Local Water and Wastewater System

Adequate drinking water service provided by El Paso Water (EPW) is only available to a small portion (30%) of the community. The remaining residents have access to service from a private water company or use private on-site wells. Service from the private water companies is inadequate and does not comply with state and federal standards for small water systems. Problems with the private water systems have been documented by both the Texas Commission on Environmental Quality (TCEQ) and through a Health Impact Assessment (HIA) performed by the University of Texas in El Paso (UTEP).[5]

[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.
[5] The HIA was supported with technical assistance provided by NADB.

Service deficiencies are related to both water quality and to service reliability. Some of the documented problems with the private providers include:

- Violation of primary water quality standards with high levels of contaminants such as arsenic, total dissolved solids (TDS) and coliform;[6]
- Water outages lasting for days;
- Water pressure does not meet TCEQ standards;
- Failure to monitor for disinfectant residuals adequately; and
- Failure to provide consumer confidence reports or public notices of violations.

The existing distribution systems consist of undersized pipes that do not meet fire flow or pressure requirements. The systems are not looped and require frequent line flushing to prevent stagnate water. The wells used by the private providers produce poor quality water that requires treatment to meet primary quality standards for human consumption. These wells will be taken out of service once the new system is available.

Due to these infrastructure and service deficiencies, the proposed Project is a priority for both the U.S. Department of Agriculture Rural Development (USDA) and the U.S. Environmental Protection Agency, which selected the Project to receive grant funding from the Project Development Assistance Program (PDAP) and Border Environmental Infrastructure Fund (BEIF). The Project will address all the problems described above. However, there are a few homes with private wells (approximately 10% of the community's households) located in the north end of Vinton, which is primarily an industrial area, that cannot feasibly be considered within the current Project scope.

Based on the condition of the existing water infrastructure, none of it is salvageable. New storage capacity, distribution lines, residential connections and meters will be installed under the proposed Project. A new drinking water source will be made available through an inter-local agreement with EPW, which is already serving approximately 30% of Vinton households. The agreement provides for the connection of the new drinking water system to EPW infrastructure and water supply. Although Vinton will own the new water system, EPW will operate and maintain the new infrastructure built under the Project.

Currently, the Village of Vinton does not have access to centralized wastewater services; however, a wastewater collection system project has been certified by NADB, and funds have been approved from EPA and the Texas Water Development Board for its implementation. Procurement for Phase 1 of the wastewater initiative began in November 2019 with construction expected to commence in the first quarter of 2020. The wastewater collection infrastructure will also be owned by Vinton, but its operation and maintenance will be provided by EPW.

[6] Source: Hargrove W.L., *Healthy Vinton*: A Health Impact Assessment Focused on Water and Sanitation in a Small Rural Town on the U.S.-Mexico Border. International Journal of Environmental Research and Public Health, April 7, 2015.

3.1.2. Project Scope

The Project consists of constructing a drinking water distribution system for the Village of Vinton and includes the following components:

- *New drinking water distribution system, Phase I* (USDA): Activities include the installation of 21,358 linear feet of 6- to 12-inch polyvinyl chloride (PVC) pipe, fire hydrants and gate valves. Additionally, two master meters to monitor the volume of water purchased from EPW and service meters will be installed.

- *New drinking water distribution system, Phase II* (BEIF): Activities include the installation of 15,229 linear feet of 6- to 12-inch PVC pipe, fire hydrants and gate valves. Additionally, one master meter and service meters will be installed.

The Village will need to acquire the existing infrastructure from the private water companies, although all of it will be abandoned. Additionally, the Project will provide funds to purchase adequate storage capacity from a regional water storage tank currently under procurement by EPW at a location near Vinton. Both of these activities will be completed with USDA funds.[7] Figures 2 and 3 provide a schematic layout of the new drinking water infrastructure.

[7] Although an existing storage tank is currently available, it does not have sufficient capacity to comply with the storage requirements for the additional service needs of Vinton or surrounding unserved communities. A portion of Phase I and all of Phase II of the new system will receive water from the new storage tank.

Figure 2
PHASE 1 WATER DISTRIBUTION SYSTEM LAYOUT

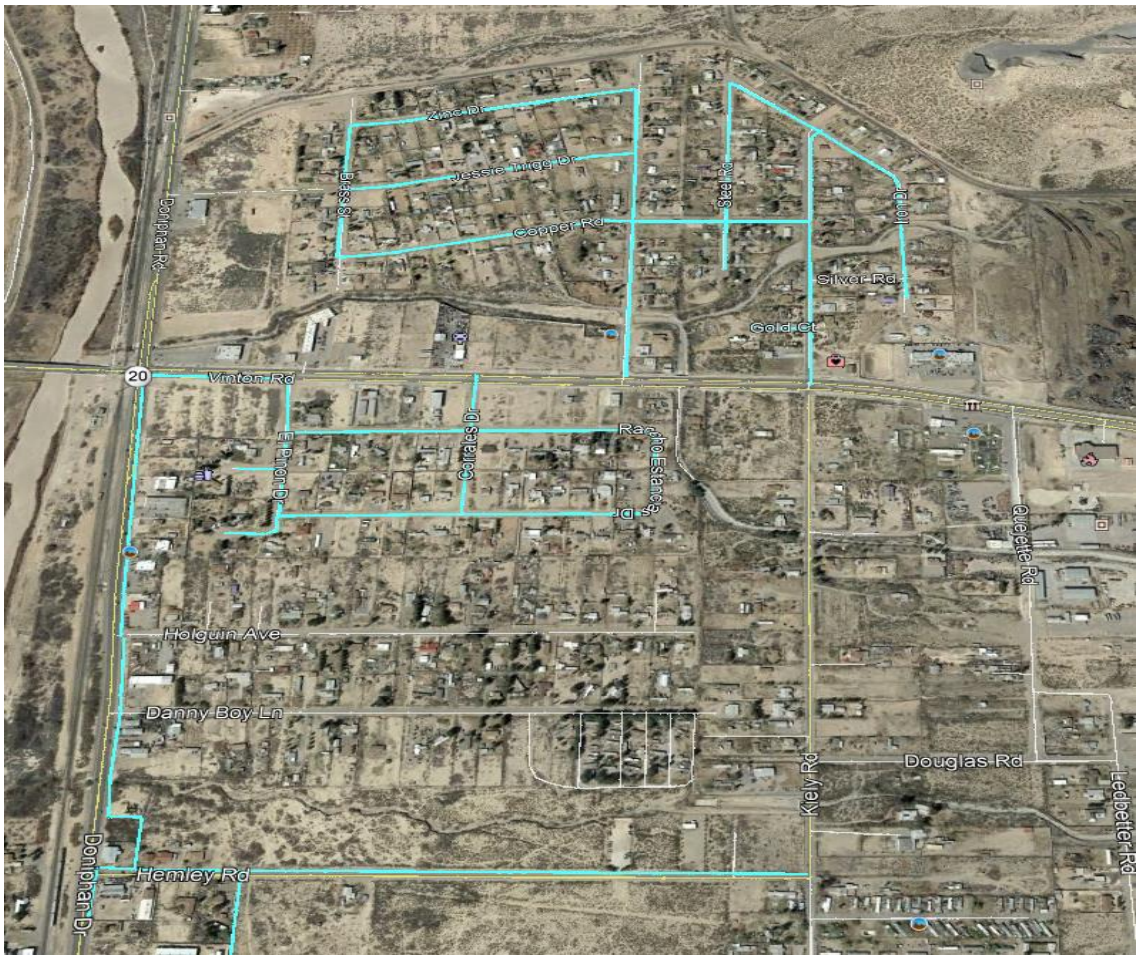
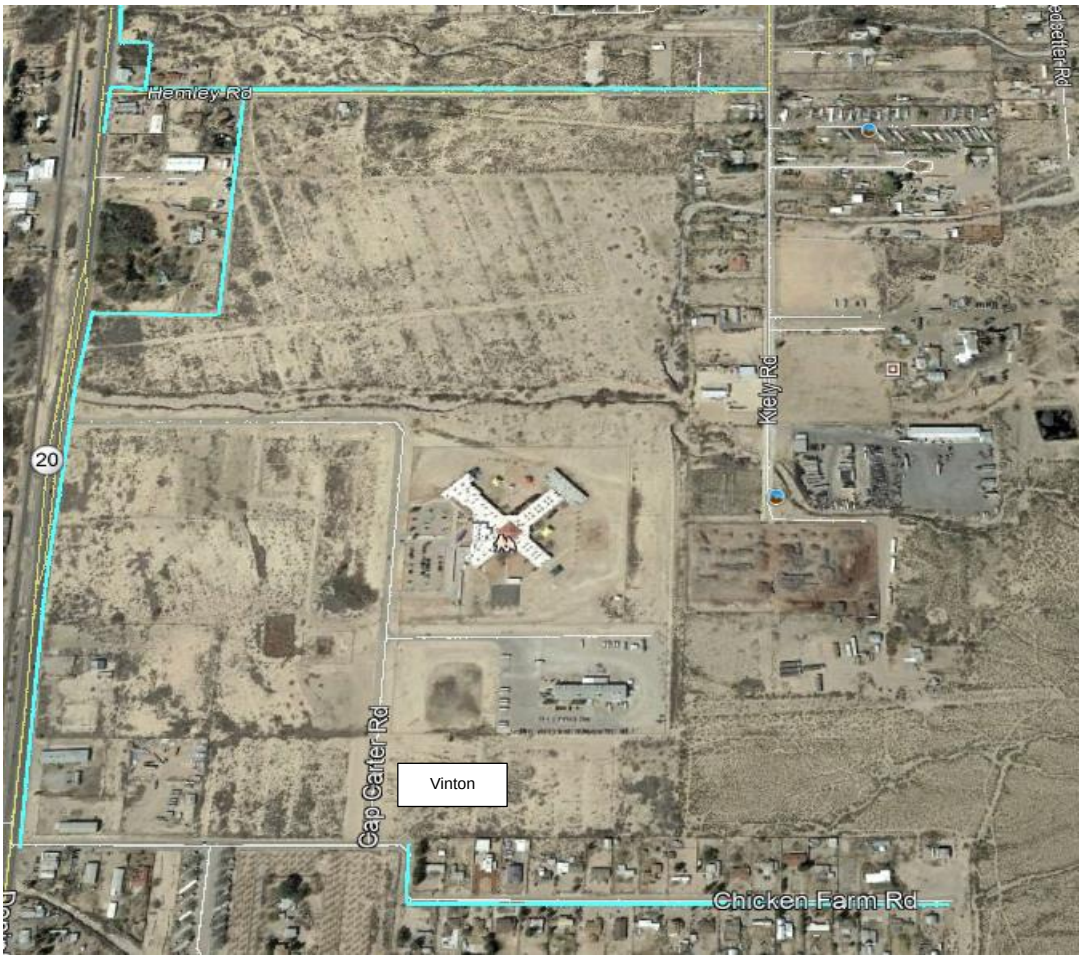


Figure 3
PHASE 2 WATER DISTRIBUTION SYSTEM LAYOUT



As a result of this Project, approximately 90% of the community will be connected to the drinking water system, including areas of Vinton already receiving service from EPW, such as Holguin Avenue, Kiely Road and Danny Boy Lane. Areas not covered by this Project are north of a natural creek and include an industrial area along Chicken Farm Road. Challenges in designing a water crossing, various land ownership issues, and the low density of residential connections in the area, have made it unfeasible to provide service at this time.

3.1.3. Technical Feasibility

A Preliminary Engineering Report was completed for the Project in November 2015, using the required USDA format. It provided a description of the current status of services in Vinton and analyzed alternatives to select the ideal owner/operator structure to support sustainable drinking water service for the Village, along with the no-action alternative.

The no-action alternative was rejected since it fails to address the health risks created by the regulatory deficiencies and water quality issues of the private water companies. Therefore, the analysis focused on an appropriate owner/operator structure, as well as the process required to provide service in the areas currently owned by the private water companies.

The owner/operator options included ownership, operation and water supply by Vinton versus ownership by Vinton with operation and water supply by EPW. The first option was rejected because of the high capital and operational costs related to drilling and equipping a new water supply and providing treatment to address the poor water quality of the current groundwater aquifer that would be extracted by existing or new wells. This option would require a significant effort by the Village to develop full utility services with trained and certified operating staff, as well as administrative resources for account management activities.

The recommended alternative proposes that Vinton own the water system infrastructure and contract EPW to provide water supply, operation, maintenance and billing services. This option was selected because it does not obligate Vinton to develop and maintain a full water utility, and, therefore, requires less capital investment than the other option, resulting in lower rates for consumers. EPW has an excellent performance record, and sufficient water supply capacity to meet the needs of Village residents. Furthermore, EPW will provide similar services for the new wastewater collection system under development in the community; therefore, community residents will have consistent billing and administrative processes for both utility services.

After selecting the owner/operator option, the design for Vinton's water system considered such issues as constructability, property acquisition requirements and coordination opportunities with the wastewater collection system project. To comply with the inter-local agreement with EPW for system operations, the Project design will conform to EPW Design Standards for Water and Sanitary Sewer Facilities, which are compatible with the public water system requirements set by TCEQ Rules, Chapter 290, Subchapter D. The new infrastructure will need to meet such design standards as: minimum pipe diameters of 6-inches for distribution lines, a minimum pipe diameter of three quarters of an inch for service lines, adequate capacity to meet fire flow and peak daily or hourly demand, normal operating pressures of 35 pounds per square inch, and flow velocities between five and seven feet per second.

3.1.4. Land Acquisition and Right-of-Way Requirements

This Project will be constructed within public rights of way and 28 easements acquired for the Project. Although a public right of way managed by the Texas Department of Transportation is available along Doniphan Road, private easements were purchased to avoid impacts to traffic, the need for expensive repaving activities and possible complications from the shared use of the public easement with other underground utilities.

Additionally, most of the easements were purchased for the installation of drinking water and wastewater infrastructure. Those easements are large enough to maintain adequate separation between both services.

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

3.1.5. Project Milestones

A Preliminary Engineering Report and Environmental Review were completed for the Project in 2012; however, the Project was delayed because the Village Council could not agree on the funding structure for Project implementation. Once this issue was resolved, the documents were updated in 2017, and EPA issued a positive environmental ruling in 2018. Design has also been completed.

Bidding for construction of Phase I of the drinking water system funded by USDA is expected to be completed by the end of the first quarter of 2020. The BEIF grant will support the cost of constructing Phase II of the system. Procurement for the second phase is anticipated to be initiated in the second 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	Completed
Final design	Completed
Procurement – Phase I USDA	Initiated fourth quarter 2019
Procurement – Phase II BEIF	Initiate second quarter 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 water distribution 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 service to over 200,000 metered water connections and to approximately 195,000 wastewater customers.

Additionally, EPW has high levels of institutional capacity as evidenced by its operations of highly 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. Vinton's water supply will come from a variety of sources, since EPW water is blended from Rio Grande surface water, water pumped from the Hueco-Mesilla Bolzon Aquifer and desalinated groundwater. Initially, the Village is expected to use an estimated 3,568,000 gallons/month (120,000 gallons/day) and, upon complete build-out, could consume nearly 500,000 gallons/day.

EPW has sufficient water supply to meet demand in Vinton and is constructing a new storage tank to meet TCEQ storage capacity requirements.

EPW currently has a variety of service agreements in the area, ranging from simply supplying water in bulk 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 El Paso city limits.

3.2. Environmental Criteria

3.2.1. Environmental and Health Effects/Impacts

A. Existing Conditions

Currently, residents of Vinton receive water service either from EPW or from one of the four private water systems being purchased by Vinton. The drinking water service and physical infrastructure of the private systems have a variety of compliance issues. In some cases, service outages, most often occurring during summer months with temperatures above 100^{o} F, have lasted for several days, and residents have been exposed to risks related to backflow and other quality issues due to intermittent service, as well as to unhealthy conditions related to heat and inoperable water-dependent cooling systems.

Moreover, the water produced by the private systems does not meet primary quality standards, and TCEQ has cited the systems for infractions ranging from failure to maintain appropriate records and inadequate storage and production capacity to violations for exceeding maximum allowable contaminant levels for arsenic, TDS and coliforms. In 2014, sample tests of the local water supply revealed excessive levels of arsenic, TDS, and the presence of coliforms.[8] TCEQ has issued administrative orders to the companies to enforce compliance; however, because the proposed Project is expected to address these conditions, fines have been waived.

Lack of access to potable drinking water poses a risk for transmission of waterborne diseases associated with pathogenic microorganisms found in 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.

[8] Source: Hargrove W.L., *Healthy Vinton*: A Health Impact Assessment Focused on Water and Sanitation in a Small Rural Town on the U.S.-Mexico Border. International Journal of Environmental Research and Public Health, April 7, 2015.

Table 3
WATERBORNE DISEASE STATISTICS FOR El 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 from the state epidemiological system, 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 is economically similar and has water and wastewater services from EPW. 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 provide reliable and sustainable drinking water service and thus reduce human health risks associated with waterborne diseases, by providing new distribution infrastructure and access to a fully compliant water source. Specifically, the Project is expected to generate environmental and human health benefits related to the following outcomes:

- Increase access to safe and reliable drinking water services for 367 households;
- Eliminate exposure to arsenic and pathogenic organisms that have been identified in the existing water sources.[9]
- Provide regional benefits through the construction of a storage tank that will serve Vinton and surrounding small communities.

To enhance the benefits of the Project, planning and design included the replacement of all existing distribution system infrastructure, which was plagued with leaks and substandard materials. Additionally, key EPW policies, such as water conservation practices, will be enforced in the Vinton service area.

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 slightly increase demand on EPW's water supply, which is drawn from binational water sources, including the Hueco-Mesilla Bolsons Aquifer and the Rio Grande. EPW has developed a successful water

[9] TCEQ has issued administrative orders against the existing providers for issues related to arsenic violations.

resource diversification and conservation strategy; therefore, the transboundary impact of the Project is expected to 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 Safe Drinking Water Act (SDWA) is the primary law regulating public water systems. In accordance with the SDWA, EPA has published regulatory requirements setting limits on the level of contaminants allowed in drinking water. TCEQ is responsible for monitoring drinking water systems and issuing enforcement actions in those cases where systems are not in compliance.

A. <u>Environmental Clearance</u>

In compliance with NEPA, an Environment Information Document (EID) was developed. The EID addresses environmental impacts resulting from the implementation of the Project. Specific areas addressed under 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.

The Environmental Assessment identified benefits to human health achieved by the reduction of contaminants in the community's potable water supply, as well as positive impacts related to social justice issues. 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 in 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 Environmental 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; and
- 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 contaminating surface water resources; and
- All construction personnel will attend a briefing to familiarize workers with potential construction impacts and 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.

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$10,618,500, which includes construction, supervision, storage capacity buy-in, private system buy-out and contingencies. The Sponsor requested a BEIF grant to support the implementation of the Project and improve the affordability of the investment. 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$3,500,000 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 Phase I*	$ 4,760,500	44.8
Construction Phase II*	3,500,000	33.0
Storage tank buy-in	1,610,000	15.2
Private system buy-out	748,000	7.0
TOTAL	**$ 10,618,500**	**100.0**
Sources	**Amount**	**%**
U.S. Department of Agriculture (USDA) grant	$ 4,760,500	44.8
USDA loan	2,358,000	22.2
NADB-BEIF (EPA grant)	3,500,000	33.0
TOTAL	**$ 10,618,500**	**100.0**

* Estimated costs include supervision and contingencies.

The cost of building the drinking water system will be financed by a loan and grant from USDA, which together represent close to 70% of the total cost of the Project. The proceeds of the BEIF grant will be used to cover the remaining 30% of the construction costs, allowing the community to complete Phase II of the Project while maintaining affordable user rates for the entire Project area.

4. PUBLIC ACCESS TO INFORMATION

4.1. Public Consultation

NADB published the draft certification proposal for a 30-day public comment period beginning December 19, 2019. The following Project documentation was made available upon request:

- Phase I Vinton Water Design, July 2019.
- Phase II Vinton Water Design, October 2019.

- Preliminary Engineering Report, Village of Vinton Water System Improvement Project, November 2015.
- Environmental Report, Village of Vinton Proposed Water System Improvements, August 2012.
- Environmental Assessment and Finding of No Significant Impact for Drinking Water Infrastructure Construction Project, Vinton, Texas, April 23, 2018.

The public comment period ended on January 18, 2020, 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 Sponsor disseminate information regarding the Project. Technical and financial information about the Project 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* (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 drinking water and is located in the border region, as required under NADB Charter. The 30-day public comment period ended on January 18, 2020, 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 Environment Infrastructure Fund (BEIF). The project meets all BEIF program criteria, and the U.S. Environmental Protection Agency (EPA) is expected to approve a BEIF grant for up to US$3,500,000.

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