



## REGION 9

SAN FRANCISCO, CA 94105

### **FINDING OF NO SIGNIFICANT IMPACT**

#### **Drinking Water and Wastewater Collection Infrastructure West Expansion Project for the City of Douglas, Arizona**

The U.S. Environmental Protection Agency, Region 9 (EPA) intends to authorize funding from the Border Water Infrastructure Program (BWIP) appropriation account to construct the West Expansion Project, City of Douglas, Arizona. This is a federal action requiring compliance with the National Environmental Policy Act (NEPA), 42 USC §§4321-4370f. In accordance with NEPA, Council of Environmental Quality Regulations at 40 CFR §§1500.1–1508.28, and NEPA regulations at 40 CFR Part 6, EPA has prepared an Environmental Assessment (EA) describing the potential environmental impacts associated with the Proposed Action and the No Action Alternative. This Finding of No Significant Impact (FONSI) documents EPA's determination that the proposed project will not have a significant effect on the environment.

#### **Project Location and Description**

The proposed project is located west of the City of Douglas in Cochise County, Arizona, along State Route 80 from U.S. Highway 191 to the Cochise College Douglas Campus, with an additional wastewater segment extending south toward West Puzzi Rancho Road.

#### **Purpose and Need for Proposed Project**

The proposed project will install new drinking water and wastewater infrastructure to extend utility service to areas west of the City of Douglas, replacing individual on-site septic systems and private wells. The expansion of the water and wastewater infrastructure will meet the current and projected utility service needs and promote the health and well-being of the residents in the expanded area. The new drinking water infrastructure would provide property owners with safe, reliable, and convenient access to clean drinking water. The wastewater expansion area would transition septic systems to centralized wastewater infrastructure, thereby improving reliability during high system loads while protecting sources of drinking water.

#### **Alternatives Considered**

EPA examined two alternatives, the Proposed Action and the No Action Alternative.

- No Action Alternative: Under the No Action Alternative, there are no construction activities.
- Proposed Action (Preferred Alternative): The Proposed Action includes the installation of new drinking water and wastewater infrastructure to areas west of the City of Douglas. The drinking water system expansion includes construction of a new water campus consisting of a groundwater well, west high-pressure zone water storage tank, and associated components,

along with well improvements, a new raw water line, and new water distribution lines connecting to Cochise College and surrounding areas. The wastewater collection expansion would connect to the existing sewer main and include wastewater collection line installation of over 43,200 feet.

## Environmental Review

Based on the environmental impacts analysis in the EA, EPA has determined that no significant environmental impacts are anticipated from the issuance of funding for this project and the Proposed Action does not constitute a major Federal action significantly affecting the quality of the human environment, making the preparation of an environmental impact statement unnecessary. Consequently, EPA hereby issues this FONSI to document its determination.

The mitigation measures identified in Table 1 include environmental protection measures and best management practices (BMPs) that will be implemented for the Proposed Action to avoid or minimize adverse impacts.

**Table 1** Summary of Environmental Protection Measures and Best Management Practices

Environmental Resource	Environmental Protection Measures/Best Management Practices
Air Quality and Odor	<ul style="list-style-type: none"> <li>• Minimize idling conditions for construction equipment and vehicles.</li> <li>• Minimize the amount of new exposed soil/surface disturbance.</li> <li>• Apply water and/or dust suppressants periodically to exposed disturbed surface areas.</li> <li>• Reduce vehicle and equipment speeds on unpaved surfaces.</li> <li>• Cover or apply water to all open storage piles.</li> <li>• Regular maintenance and piping inspections would be conducted to help prevent septic conditions and reduce sulfide generation.</li> <li>• Implementation of a dust control plan based on dust suppressant application prior to and during excavation and trenching activities to reduce the potential for fugitive dust emissions.</li> </ul>
Water Resources including Groundwater	<p>The new proposed water well would require review and approval by the ADWR in accordance with Arizona Revised Statutes Title 45, Chapter 2, Article 10, and the rules adopted thereafter. The City has applied for and received a Non-Exempt Well Permit from ADWR pursuant to A.R.S. §45-598 and §45-599.</p> <ul style="list-style-type: none"> <li>• Prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) to define site characteristics based on construction activities to reduce potential erosion, sedimentation, and stormwater impacts.</li> <li>• Use erosion control practices identified in “Soils and Geology” BMPs to reduce infiltration of potential contaminants in runoff.</li> </ul>
Wetlands and Waters of the U.S.	<p>Avoid waters of the U.S. and wetlands. No work is allowed within waters (this includes dry washes and/or drainages with water present) or riparian vegetation unless deemed necessary and required permits are obtained.</p>
Floodplains	<ul style="list-style-type: none"> <li>• For the crossing of Whitewater Draw, additional study would occur as detailed design is developed to determine the approach to crossing the regulatory floodplain in this area. If avoidance is not feasible, additional measures will be taken to comply with Executive Order 11988 Floodplain Management.</li> <li>• The regulatory floodplain would be identified on construction documents and the contractor instructed to avoid construction in the floodplain.</li> </ul>
Geology and Soils	<p>Stormwater and erosion control BMPs would be implemented during construction and local county and city requirements adhered to, including soil stabilization and seeding to reduce the likelihood of erosion.</p> <ul style="list-style-type: none"> <li>• Permanent seeding of disturbed areas</li> <li>• Mulching with straw, wood fiber, or compost</li> <li>• Erosion control blankets or mats on slopes and channels</li> <li>• Preservation of existing vegetation where feasible</li> <li>• Use of straw wattles and/or silt fences along slopes to slow runoff, capture sediment, and reduce soil erosion</li> </ul>

<b>Environmental Resource</b>	<b>Environmental Protection Measures/Best Management Practices</b>
Noise	Construction would adhere to Chapter 8.28 – Noise of the City of Douglas Municipal Code.
Cultural Resources and Historic Properties	<ul style="list-style-type: none"> <li>• On November 21, 2025, EPA received concurrence from the Arizona State Historic Preservation Office on the determination of no adverse effect on historic properties, as required by Section 106 of the National Historic Preservation Act (NHPA).</li> <li>• Construction contracts related to the proposed project will include provisions for protection of cultural resources if identified. Standards of practice as they are defined in Section 106 of the NHPA of 1966, as amended, will be maintained during all construction and ground disturbing activities, and if previously unidentified cultural or historical resources are discovered during construction, work at that location will stop immediately, all reasonable steps to secure the preservation of those features will be taken, and the State Historic Preservation Office, the North American Development Bank (which will oversee construction), and EPA must be notified.</li> <li>• Pursuant to Arizona Revised Statutes §41-865, et seq., if any human remains or funerary objects are encountered at any time during construction, the contractor is to cease all work and notify the Arizona State Museum.</li> </ul>
Hazardous Materials	<p>Work is not anticipated through any sites identified as containing hazardous materials. If unexpected hazardous materials are encountered, the following procedures will be followed.</p> <ul style="list-style-type: none"> <li>• If suspected contamination is encountered, stop work in the affected area, isolate the area as appropriate, and evaluate/characterize materials prior to management/disposal.</li> <li>• Manage and dispose of contaminated materials in accordance with applicable federal/state/local requirements at an appropriately permitted facility.</li> </ul>
Transportation and Traffic	The contractor would be required to prepare and implement a Traffic Management Plan during construction based on ADOT (SR 80) and County DOT (Kings Highway) policies and procedures to manage traffic and implement traffic safety measures.
Biological Resources	<p>Noxious and Invasive Plant Species Treatment and Control</p> <ul style="list-style-type: none"> <li>• The City would include special provisions in the contract to address the identification, treatment, and control of noxious and invasive plant species within the Project limits.</li> <li>• The contractor would develop and implement a Noxious and Invasive Plant Species Treatment and Control Plan (Plan) in accordance with the contract requirements. The Plan would include the identification, treatment, and control of species listed on the Arizona Noxious Weed List, the Federal noxious weeds list (7 CFR §360.200), and the Arizona invasive species list, and would comply with relevant State and federal laws and executive orders. The Plan and associated treatments shall apply to all areas within the Project ROW and easements shown on the Project plans. The contractor would submit the Plan to a registered landscape architect retained by the City for review and approval prior to implementation.</li> <li>• Prior to the start of ground-disturbing activities and throughout the duration of construction and any landscape establishment period, the contractor shall arrange for and perform the control of noxious and invasive species in the Project area.</li> <li>• To prevent the introduction of invasive species seeds, all earthmoving and hauling equipment shall be washed prior to entering the construction site, and the contractor shall inspect all construction equipment and remove all attached debris, including plant parts, soil, and mud, prior to the equipment entering the construction site.</li> <li>• To prevent invasive species seeds from leaving the site, the contractor shall inspect all construction and hauling equipment and remove all debris, including plant parts, soil, and mud, prior to leaving the construction site.</li> </ul> <p>Arizona Native Plant Law Compliance</p> <ul style="list-style-type: none"> <li>• A registered landscape architect retained by the City of Douglas would determine whether notification to the Arizona Department of Agriculture is required for any protected native plants that may be impacted by the Project. If notification is required, the landscape architect would notify the City and send the notification to Arizona Department of Agriculture at least 60 calendar days prior to the start of construction.</li> </ul>

Environmental Resource	Environmental Protection Measures/Best Management Practices
	<p>Nesting Bird Protections</p> <ul style="list-style-type: none"> <li>• A pre-construction nesting bird survey will be conducted by a qualified biologist in suitable habitat (such as ephemeral washes and existing bridges) at least 10 days prior to initiating work during the nesting bird season (March 1 to August 31). If any active bird nests identified within the Project limits, construction activities will avoid disturbing the nest. Avoidance areas, if necessary, will be marked in the field until the nestlings have fledged and the nest is no longer active.</li> <li>• No work will occur within 300 feet of the ephemeral drainage at Whitewater Draw during nesting bird season (March 1 to August 31).</li> <li>• The contractor shall remove all trees and shrubs during the nonbreeding season (September 1 to February 28) to avoid impacts to nesting birds known to occur in the area.</li> </ul>

### Public Review Period and Comments

EPA made the preliminary FONSI and Draft EA, available for a 30-day public review and comment period which concluded on January 30, 2026, in accordance with 40 CFR Part 6. These documents were available for review from EPA’s NEPA Compliance Database at: [cdxapps.epa.gov/cdx-enepa-II/public/action/nepa/search](https://cdxapps.epa.gov/cdx-enepa-II/public/action/nepa/search) and <https://www.epa.gov/small-and-rural-wastewater-systems/us-mexico-border-water-infrastructure-grant-program-public>. Notice of the public comment period was published in the Sierra Vista Herald and Douglas Dispatch on December 31, 2025.

EPA received one agency and two public comments from individuals, some of which included multiple comments. All comments are addressed in the Final EA in Appendix C. No substantial changes to the Proposed Action were necessary as a result of public comments. The FONSI is available on the EPA website at: <https://www.epa.gov/small-and-rural-wastewater-systems/us-mexico-border-water-infrastructure-grant-program-public>. The Final EA and FONSI (EPA No. N2025470) are also available at EPA’s NEPA Compliance Database at: [cdxapps.epa.gov/cdx-enepa-II/public/action/nepa/search](https://cdxapps.epa.gov/cdx-enepa-II/public/action/nepa/search).

### Finding

Based on the information contained in the EA, and after reviewing public comments, EPA has determined the proposed project will not result in significant impacts to the environment and thereby, an environmental impact statement is not required.

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Tomás Torres, Director  
Water Division

March 30, 2026  
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Date