

Why You Should Read This: The document below reviews the environmental impact likely from a State Revolving Fund project. As part of the environmental review, you are entitled to provide comments. If you have concerns about the environmental impact of this project, raise them now. We encourage public input in this decision-making process.



IOWA STATE REVOLVING FUND
FINDING OF NO SIGNIFICANT IMPACT

August 14, 2026

To: All Interested Citizens, Government Agencies, and Public Groups

An environmental review has been performed based on the procedures for implementing the National Environmental Policy Act (NEPA), for the proposed agency action below:

Applicant: City of Early

County: Sac

State: Iowa

Early Water Supply Project

SRF Number: FS-81-26-DWSRF-013

Iowa DNR Project Number: W2025-0428

The City of Early, Iowa is planning an upgrade to their drinking infrastructure. The City has applied for financial assistance through the State Revolving Fund (SRF) loan program to build the project. The State Revolving Loan Program is a program authorized by the Environmental Protection Agency (EPA) and administered by the Iowa Department of Natural Resources (DNR) in partnership with the Iowa Finance Authority. This project will not be receiving federal funds through SRF.

The City of Early is located in Sac County, Iowa approximately 60 miles east of Sioux City, Iowa and 50 miles west of Fort Dodge, Iowa. The population of Early according to the 2020 US Census was 587. The design population equivalent for the year 2045 is 587.

The City of Early's water system consists of two active wells, one water treatment facility, one elevated water storage tank, and a city-wide distribution system.

The City has two active wells that supply raw water to the treatment facility. Well 1 was constructed in the 1970s, and Well 2R was constructed in 2011. In the past, the City has used two other wells, which have since been abandoned. These wells are commonly referred to as Abandoned Well 1 and Well 2. The existing Well 1 is a replacement for the Abandoned Well 1. Well 2R is a replacement well for the original Well 2, which was abandoned due to surface contamination. The east well, Well 1 is located 1,300 feet east of the water treatment facility on property that is not owned by the City. The City maintains an easement around the well itself, but the landowner farms the property up to the easement line. This farming practice has included fertilizing the property with nitrogen-based fertilizer via injection. The south well, Well 2R, is located nearly a mile south of the treatment facility, near the location of abandoned Well 2; this area is City owned property.

Both wells are relatively shallow wells in a surficial aquifer. This aquifer is unconfined at the top and is at risk for surface contamination. Additionally, the shallow depth of these wells makes them subject to changes in climate and groundwater levels during drought conditions.

Well 1 is approximately 55-60 years old. The City does not have good records of Well 1 maintenance and is not sure of the condition of the well casing. The Well 1 pump and motor were replaced in 2023. Well 2R was constructed in 2011, after it was discovered that Well 2 could no longer be used. This well is about 15 years old and is thought to be in good condition. The well has not been thoroughly inspected since installation, but the pump and motor were replaced in 2023. There have been no other significant repairs or maintenance conducted on this well since construction.

Due to historic long-term drought conditions in the area, the water levels over the last 10 years have dropped significantly in both wells. When both wells are recharged, they are only able to pump approximately 45 gallons per minute (gpm) each, over a 60% reduction in their design capacity, due to the extremely low water levels in the wells.

The water treatment plant was designed for each well to pump a design flow of 115 gpm, which results in the wells generally running 6.5 to 8.5 hours per average day, depending on demand. On a peak day, the wells could be running up to 18 to 20 hours to accommodate peak demands. Because the plant process is a reverse osmosis system, it is important that a steady flow rate of 115 gpm into the facility be maintained. The wells are currently able to provide flow of 0-45 gpm each to the treatment facility and are not able to meet the required flow rate.

The City's current raw water supply has high levels of nitrate. As nitrate has a National Primary Drinking Water Maximum Contaminant Limit, this is an undesirable raw water trait. The raw water is currently treated with reverse osmosis to remove Nitrate from the water.

The City of Early's existing wells do not currently have sufficient yield for the current and projected water demands. Well No. 2 has pumped dry within the past year, and experiences significantly low levels with poor recharge. Well No. 1 is unable to recharge to provide a firm capacity sufficient for the City's demands.

The purpose of this project is to make improvements to the City's drinking water infrastructure to enhance their reliability, increase capacity and to replace obsolete systems, in order to safely and reliably operate the City of Early's drinking water system for the next 20 years.

The project includes test well drilling to the Dakota Aquifer, approximately 300-350' deep, under the planning and design phase of the project. After the test well results have been analyzed and approved, the test well will be converted into a municipal supply well. This project also includes the raw water main connections and electrical/controls connections and all necessary connections and appurtenances.

The project will not significantly affect the pattern and type of land use (industrial, commercial, agricultural, recreational, residential) or growth and distribution of population. The project will not conflict with local, regional or State land use plans or policies. The project will not impact wetlands. The project will not affect threatened and endangered species or their habitats. If any State- or Federally-listed threatened or endangered species or communities are found during the planning or construction phases, additional studies and/or mitigation may be required. Section 9 of the Endangered Species Act may apply and other wildlife conservation laws such as the Migratory Bird Treaty Act of 1918 and the Bald and Golden Eagle Protection Act of 1940. The project will not displace population, alter the character of existing residential areas, or convert significant farmlands to non-agricultural purposes. The project will not affect the 100-year flood plain. The project will not have effect on parklands, preserves, other public lands, or areas of recognized scenic or

recreational value. Various Native American tribes with an interest in the area and the Certified Local Government were provided information regarding the project.

This project will not be receiving federal funds through SRF. As such, this project is not considered a federal undertaking as defined in §300320 under the National Historic Preservation Act, 54 U.S.C. 300101 et seq. for the purpose of the SRF environmental review. If this SRF project receives federal funds from other sources, it is the responsibility of the applicant to ensure all federal requirements are met for that funding.

If project activities uncover any item(s) that might be of archaeological, historical, or architectural interest, or if important new archaeological, historical, or architectural data should be encountered in the project APE, the applicant should make reasonable efforts to avoid further impacts to the property until an assessment can be made by an individual meeting the Secretary of the Interior's professional qualifications standards (36 CFR Part 61).

The project will not have a significant adverse effect upon local ambient air quality provided the applicant takes reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property during the proposed project (567 IAC 23.3(2)“c”). The project will not have a significant adverse effect upon local ambient noise levels, surface water quantity, groundwater quality or quantity, or water supply. No significant impact to surface water quality, fish, shellfish, wildlife, or their natural habitats is expected provided that an NPDES General Permit Number 2 (for storm water discharge associated with construction activities) is obtained and the terms of which are abided by.

Minimum separation distances will be maintained. Noise during construction will be maintained at tolerable levels through controls on construction activities. Any construction debris will be removed from the site for proper disposal. Adverse environmental effects from construction activities will be minimized with proper construction practices, inspection, prompt clean up and other appropriate measures. Areas temporarily disturbed by the construction will be restored.

It has been determined that the proposed action will result in no significant impacts to the surrounding environment. This determination is based on a careful review of the engineering report, the environmental assessment and other supporting data which are on file at the Department of Natural Resources' office in Des Moines, Iowa. These are available for public review upon request. A copy of the environmental assessment is attached. This Department will not take any administrative action on the project for at least thirty (30) calendar days from the above date. Persons disagreeing with the above environmental decision may submit comments to the department during this period. Your comments can be sent to SRF-PC@dnr.iowa.gov or directly to me at Hailey.Andersen@dnr.iowa.gov or (515) 321-7385.

Sincerely,

Hailey Andersen
Environmental Specialist
6200 Park Ave, Suite 200
Des Moines, IA 50321

Enclosures: Environmental Assessment Document
Project Map

Distribution

List (email): Bolton & Menk, Inc.
Edward Boling, Council on Environmental Quality
Jake Hansen, Iowa Department of Agriculture and Land Stewardship
Ken Sharp, Iowa Department of Health & Human Services
Mindy Wells, Iowa Department of Health & Human Services
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Michael Schmidt, Iowa Environmental Council
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Yolanda Attaway, Iowa Finance Authority
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Tokey Boswell, USDOL, National Park Service, Midwest Region
Kraig McPeck, Fish and Wildlife Service, Rock Island Field Office
Ann D'Alfonso, USEPA Region VII
The Chronicle

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IOWA STATE REVOLVING FUND
ENVIRONMENTAL ASSESSMENT DOCUMENT

PROJECT IDENTIFICATION

Applicant: City of Early
County: Sac
State: Iowa
Early Water Supply Project

SRF Number: FS-81-26-DWSRF-013
Iowa DNR Project Number: W2025-0428

COMMUNITY DESCRIPTION

Location: The City of Early is located in Sac County, Iowa approximately 60 miles east of Sioux City, Iowa and 50 miles west of Fort Dodge, Iowa.

Population: The population of Early according to the 2020 US Census was 587. The design population equivalent for the year 2045 is 587.

Current Source of Water: The City of Early's water system consists of two active wells, one water treatment facility, one elevated water storage tank, and a city-wide distribution system.

The City has two active wells that supply raw water to the treatment facility. Well 1 was constructed in the 1970s, and Well 2R was constructed in 2011. In the past, the City has used two other wells, which have since been abandoned. These wells are commonly referred to as Abandoned Well 1 and Well 2. The existing Well 1 is a replacement for the Abandoned Well 1. Well 2R is a replacement well for the original Well 2, which was abandoned due to surface contamination. The east well, Well 1 is located 1,300 feet east of the water treatment facility on property that is not owned by the City. The City maintains an easement around the well itself, but the landowner farms the property up to the easement line. This farming practice has included fertilizing the property with nitrogen-based fertilizer via injection. The south well, Well 2R, is located nearly a mile south of the treatment facility, near the location of abandoned Well 2; this area is City owned property.

Both wells are relatively shallow wells in a surficial aquifer. This aquifer is unconfined at the top and is at risk for surface contamination. Additionally, the shallow depth of these wells makes them subject to changes in climate and groundwater levels during drought conditions.

Well 1 is approximately 55-60 years old. The City does not have good records of Well 1 maintenance and is not sure of the condition of the well casing. The Well 1 pump and motor were replaced in 2023. Well 2R was constructed in 2011, after it was discovered that Well 2 could no longer be used. This well is about 15 years

old and is thought to be in good condition. The well has not been thoroughly inspected since installation, but the pump and motor were replaced in 2023. There have been no other significant repairs or maintenance conducted on this well since construction.

Due to historic long-term drought conditions in the area, the water levels over the last 10 years have dropped significantly in both wells. When both wells are recharged, they are only able to pump approximately 45 gallons per minute (gpm) each, over a 60% reduction in their design capacity, due to the extremely low water levels in the wells.

The water treatment plant was designed for each well to pump a design flow of 115 gpm, which results in the wells generally running 6.5 to 8.5 hours per average day, depending on demand. On a peak day, the wells could be running up to 18 to 20 hours to accommodate peak demands. Because the plant process is a reverse osmosis system, it is important that a steady flow rate of 115 gpm into the facility be maintained. The wells are currently able to provide flow of 0-45 gpm each to the treatment facility and are not able to meet the required flow rate.

The City's current raw water supply has high levels of nitrate. As nitrate has a National Primary Drinking Water Maximum Contaminant Limit, this is an undesirable raw water trait. The raw water is currently treated with reverse osmosis to remove Nitrate from the water.

The City of Early's existing wells do not currently have sufficient yield for the current and projected water demands. Well No. 2 has pumped dry within the past year, and experiences significantly low levels with poor recharge. Well No. 1 is unable to recharge to provide a firm capacity sufficient for the City's demands.

PROJECT DESCRIPTION

Purpose: The purpose of this project is to make improvements to the City's drinking water infrastructure to enhance their reliability, increase capacity and to replace obsolete systems, in order to safely and reliably operate the City of Early's drinking water system for the next 20 years.

Proposed Improvements: The project includes test well drilling to the Dakota Aquifer, approximately 300-350' deep, under the planning and design phase of the project. After the test well results have been analyzed and approved, the test well will be converted into a municipal supply well. This project also includes the raw water main connections and electrical/controls connections and all necessary connections and appurtenances.

ALTERNATIVES CONSIDERED

Alternatives Considered: Several alternatives were considered for this project. This included: regionalization, or combining water distribution systems with another community or regional water supplier; acquisition of existing wells for conversion to City use; construction of a surface water supply connection; and construction of a new well – Dakota/Mississippian, Alluvial, or Drift/Buried Channel. Multiple factors must be considered in the decision-making process for the water supply project for the City of Early. Financial, technical, and implementation factors along with liability, flexibility, and ease of operation concerns should be weighed in the final decision-making process.

Reasons for Selection of Proposed Alternative: The first three alternatives considered were determined to be undesirable for the city for a number of reasons.

Regionalization generally only makes sense when it is cost effective for the communities involved. Because the City of Early recently constructed their new water treatment facility, the cost benefits of a regionalization

project don't apply. If the City were to regionalize for their water supply, they would be paying for the cost of regionalization on top of the costs of their recent water treatment facility project.

The City explored the option of acquiring existing wells for conversion to City use with several wells in the area. Many of the wells in the surrounding area did not possess sufficient capacity to meet the City's water demands. Three wells were discovered that could potentially meet the City's needs. These three wells were evaluated in detail to determine if a connection to the water treatment facility was feasible and if the water quality would be compatible with the existing treatment process. While all three wells are favorably located or connection to the water treatment plant, water quality reports for all three wells indicated levels of Iron, Manganese, Sulfate, and TDS above recommended water quality standards in the raw water supply. Iron and Manganese are both unfavorable constituents in RO feed water, as both will cause scaling and plugging of the membranes.

The City of Early has two potential nearby surface water sources, the Boyer River and the Kiowa Marsh. Both of these surface water sources are susceptible to high levels of contamination. The City of Early's existing Water Treatment Facility is not suited for surface water treatment. In order to utilize surface water as a new water supply source, the City's water treatment facility would have to undergo significant improvements. If the City were to pursue surface water sources for their water supply, they would be paying for the cost of significant treatment facility improvements, in addition to the costs of necessary conveyance infrastructure and the costs of their recent water treatment facility project.

The final option for a water supply source in the City of Early is construction of a new well. This alternative possesses the most potential for providing a water supply source that would be both economically feasible for the City, as well as compatible with their existing treatment process. Based on the City of Early's existing water treatment process and current and future water demands, the recommended alternative is construction of a new Alluvial well in the Alluvial aquifer along the Boyer River. Water quality in the Boyer River alluvial aquifer has historically been compatible with the existing reverse osmosis treatment process. This aquifer is shallow which would reduce the cost of well construction compared to a deeper aquifer, such as the Dakota/Mississippian.

MEASURES TAKEN TO ASSESS IMPACT

Public Involvement: A public hearing was held on July, 21, 2026 at 7:00PM at the City's regular council meeting. The public notice of this hearing was made available by publication in the NAME OF LOCAL The Chronicle, placed on the City website on, and posted in three prominent public locations in town on June 17 and 18, 2026. The purpose of this hearing was to present the environmental and financial impacts of the proposed improvement project. No written or oral comments were received.

Coordination and Documentation with Other Agencies and Special Interest Groups: The following Federal, state and local agencies were provided an opportunity to comment on the proposed project to better assess the potential impact to the environment:

- Flandreau Santee Sioux
- Ho-Chunk Nation
- Iowa Tribe of Kansas and Nebraska
- Iowa Tribe of Oklahoma
- Kickapoo Tribe in Kansas
- Kickapoo Tribe of Oklahoma
- Lower Sioux Indian Community Council
- Miami Tribe of Oklahoma

Omaha Tribe of Nebraska
Otoe-Missouria Tribe
Pawnee Nation of Oklahoma
Peoria Tribe of Indians of Oklahoma
Ponca Tribe of Indians of Oklahoma
Ponca Tribe of Nebraska
Prairie Band Potawatomi Nation
Prairie Island Indian Community
Sac & Fox Nation of Mississippi in Iowa
Sac & Fox Nation of Missouri
Sac & Fox Nation of Oklahoma
Santee Sioux Nation
Shakopee Mdewakanton Sioux Community
Sisseton-Wahpeton Oyate
Spirit Lake Tribal Council
Three Affiliated Tribes Mandan, Hidatsa & Arikara Nations
Upper Sioux Tribe
Winnebago Tribal Council
Yankton Sioux Tribe
Sac County Historic Preservation Commission

No adverse comments have been received from any agencies or general public to date. Conditions placed on the applicant by the above agencies in order to assure no significant impact are included in the Summary of Reasons for Concluding No Significant Impact section.

ENVIRONMENTAL IMPACT SUMMARY

Construction: Traffic patterns within the community may be disrupted and above normal noise levels in the vicinity of the construction equipment can be anticipated during construction and should be a temporary problem. Adverse environmental impacts on noise quality will be handled by limited hours of contractor work time during the day. Other adverse environmental effects from construction activities will be minimized by proper construction practices, inspection, prompt cleanup, and other appropriate measures. Areas temporarily disturbed by the construction will be restored. Solid wastes resulting from the construction project will be regularly cleared away with substantial efforts made to minimize inconvenience to area residents.

Care will be taken to maintain dirt to avoid erosion and runoff. The proposed project will disturb one or more acres of soil; therefore, the applicant is required to obtain an NPDES General Permit Number 2 (for storm water discharge associated with construction activities) and abide by its terms. Provided that this permit is obtained and the terms of which are abided by, no significant impact to surface water quality, fish, shellfish, wildlife, or their natural habitats is expected.

Temporary air quality degradation may occur due to dust and fumes from construction equipment. The applicant shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property during the proposed project (567 Iowa Administrative Code IAC 23.3(2)“c”).

Historical/Archaeological: Various Native American tribes with an interest in the area and the Certified Local Government were provided information regarding the project. This project will not be receiving federal funds

through SRF. As such, this project is not considered a federal undertaking as defined in §300320 under the National Historic Preservation Act, 54 U.S.C. 300101 et seq. for the purpose of the SRF environmental review. If this SRF project receives federal funds from other sources, it is the responsibility of the applicant to ensure all federal requirements are met for that funding.

However, if project activities uncover any item(s) that might be of archaeological, historical, or architectural interest, or if important new archaeological, historical, or architectural data should be encountered in the project area, the applicant should make reasonable efforts to avoid further impacts to the property until an assessment can be made by an individual meeting the Secretary of the Interior's professional qualifications standards (36 CFR Part 61).

Environmental: The project area was screened for the presence of wetlands, floodplains, and sovereign lands. The proposed project will not interfere with any State-owned parks, recreational areas or open spaces. The Impacts to wetlands are not anticipated. There is a stream that bisects the project area; however, project activities as they are currently purposed will not impact this water way. Should this change, the applicant will be required to comply with USACE review and permitting requirements. The project will not impact any wild and scenic rivers as none exist within the State of Iowa.

Endangered Species Act Section 7 consultation is not required for this non-federal SRF project. Section 9 of the Endangered Species Act may apply and other wildlife conservation laws such as the Migratory Bird Treaty Act of 1918 and the Bald and Golden Eagle Protection Act of 1940. However, if any State- or Federally-listed threatened or endangered species or communities are found during the planning or construction phases, additional studies and/or mitigation may be required. This project will not impact the 100-year floodplain. Impacts to flood plains are not anticipated. No adverse impacts are expected to result from this project, such as those to surface water quantity, or groundwater quality or quantity.

Land Use and Trends: The project will not displace population nor will it alter the character of existing residential areas. The proposed project is within the present corporate limits of Early in areas zoned residential, commercial, or industrial. No significant farmlands will be impacted. This project should not impact population trends as the presence or absence of existing water/sewer infrastructure is unlikely to induce significant alterations in the population growth or distribution given the myriad of factors that influence development in this region. Similarly, this project is unlikely to induce significant alterations in the pattern and type of land use.

Irreversible and Irretrievable Commitment of Resources: Fuels, materials, and various forms of energy will be utilized during construction.

Nondiscrimination: All programs, projects, and activities undertaken by DNR in the SRF programs are subject to federal anti-discrimination laws, including the Civil Rights Act of 1964, section 504 of the Rehabilitation Act of 1973, and section 13 of the Federal Water Pollution Control Amendments of 1972. These laws prohibit discrimination on the basis of race, color, national origin, sex, disability, or age.

POSITIVE ENVIRONMENTAL EFFECTS TO BE REALIZED FROM THE PROPOSED PROJECT

Positive environmental effects will be maintained water quality for the citizens of Early. A catastrophic loss of water supply could result in City-wide health impacts due to a lack of sanitation and the use of other water sources that may not meet Federal drinking water standards.

SUMMARY OF REASONS FOR CONCLUDING NO SIGNIFICANT IMPACT

- The project will not significantly affect the pattern and type of land use (industrial, commercial, agricultural, recreational, residential) or growth and distribution of population.
- The project will not conflict with local, regional or State land use plans or policies.
- The project will not impact wetlands.
- The project will not affect threatened and endangered species or their habitats. If any State- or Federally-listed threatened or endangered species or communities are found during the planning or construction phases, additional studies and/or mitigation may be required. Section 9 of the Endangered Species Act may apply and other wildlife conservation laws such as the Migratory Bird Treaty Act of 1918 and the Bald and Golden Eagle Protection Act of 1940.
- The project will not displace population, alter the character of existing residential areas, or convert significant farmlands to non-agricultural purposes.
- The project will not affect the 100-year flood plain.
- The project will not have effect on parklands, preserves, other public lands, or areas of recognized scenic or recreational value.
- Various Native American tribes with an interest in the area and the Certified Local Government were provided information regarding the project.
- This project will not be receiving federal funds through SRF. As such, this project is not considered a federal undertaking as defined in §300320 under the National Historic Preservation Act, 54 U.S.C. 300101 et seq. for the purpose of the SRF environmental review. If this SRF project receives federal funds from other sources, it is the responsibility of the applicant to ensure all federal requirements are met for that funding.
- If project activities uncover any item(s) that might be of archaeological, historical, or architectural interest, or if important new archaeological, historical, or architectural data should be encountered in the project APE, the applicant should make reasonable efforts to avoid further impacts to the property until an assessment can be made by an individual meeting the Secretary of the Interior's professional qualifications standards (36 CFR Part 61).
- The project will not have a significant adverse effect upon local ambient air quality provided the applicant takes reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property during the proposed project (567 IAC 23.3(2)"c").
- The project will not have a significant adverse effect upon local ambient noise levels, surface water quantity, groundwater quality or quantity, or water supply.
- No significant impact to surface water quality, fish, shellfish, wildlife, or their natural habitats is expected provided that an NPDES General Permit Number 2 (for storm water discharge associated with construction activities) is obtained and the terms of which are abided by.

THEREFORE:

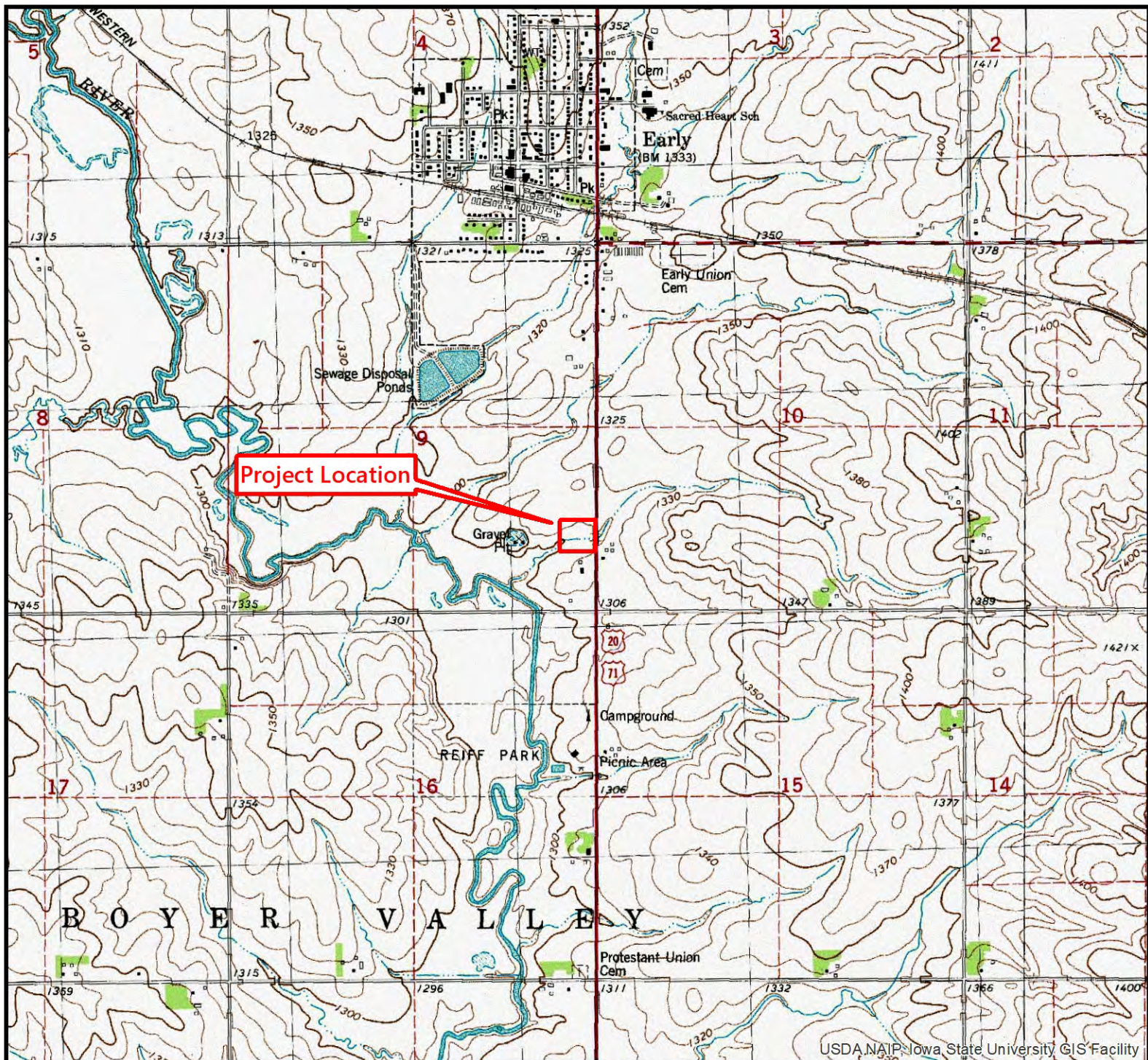
The above project conforms to the criteria in 567 Iowa Administrative Code 44.10(3) relating to compliance with the National Environmental Policy Act of 1969. This Environmental Assessment Document (EAD) outlines the justification that the environmental review for the proposed project should be classified as a Finding of No Significant Impact (FNSI) and does not rise to the significance of an Environmental Impact Statement (EIS) in accordance with 40 CFR § 1501.5.

Hailey Andersen

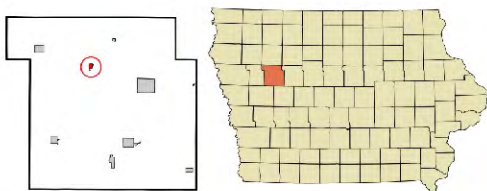
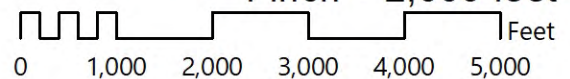
Environmental Review Specialist

State Revolving Fund

Iowa Department of Natural Resources



1 inch = 2,000 feet



USGS 7.5 Minute Quadrangle: Early
Section: 09; Township: 88N; Range: 37W
Date: 1980

Aerial Photograph

Early Water Supply Project
Early, Iowa

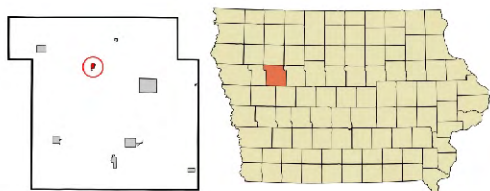


Legend
 Project Location

USDA NAIP, Iowa State University GIS Facility

1 inch = 150 feet

0 75 150 225 300 375 Feet



USGS 7.5 Minute Quadrangle: Early
Section: 09; Township: 88N; Range: 37W
Date: 10.20.2023