



September 25, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Oregon – Lucas County
Water Line Replacement Program – Seaman Road, Norden Road, and Wynn Road
Loan number: FS390721-0029**

The attached Limited Environmental Review (LER) is for a drinking water distribution project in Lucas County which the Ohio Environmental Protection Agency intends to finance through its Water Supply Revolving Loan Account (WSRLA) below-market interest rate revolving loan program. The LER describes the project, its costs, and expected environmental benefits. Making available this LER fulfills Ohio EPA's environmental review and public notice requirements for this loan program.

Ohio EPA analyzes environmental effects of proposed projects as part of its WSRLA program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. This project's relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment. More information can be obtained by calling or writing the person named at the end of the attached LER.

Upon issuance of this Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Water Line Replacement Program – Seaman Road, Norden Road, and Wynn Road

Applicant: City of Oregon
5330 Seaman Road
Oregon, Ohio 43616

Loan Number: FS390721-0029

Project Summary

The City of Oregon has applied for funding from the Ohio Water Supply Revolving Loan Account (WSRLA) for the Water Line Replacement Program – Seaman Road, Norden Road, and Wynn Road project. The project is intended to replace aged water lines and create a water line loop to eliminate a dead end within the water distribution system. The estimated loan amount for the project is \$2,629,458, with construction scheduled to begin autumn 2022 and to be completed in five months.

History & Existing Conditions

The City of Oregon (see Figure 1) withdraws water from the western basin of Lake Erie. The submerged timber frame crib is located approximately 1.5 miles offshore from the Low Service Pumping Station near Reno Beach. Water is conveyed to the Low Service Pumping Station in a 48-inch diameter intake conduit beneath the bottom of Lake Erie. Potassium permanganate is currently added at the intake bell below the crib to control zebra mussels and for taste and odor benefits. The Low Service Pumping Station includes two travelling water screens and four vertical turbine pumps with nominal rated capacities of 8 million gallons per day (MGD), 10 MGD, 17 MGD, and 17 MGD. Powdered activated carbon is added just downstream of the pumps at the station. Water is pumped through a 36-inch diameter raw water pipeline approximately 4.5 miles to the water treatment plant (WTP) at 935 North Curtice Road.

The Oregon WTP is a conventional lime-soda ash softening plant that is rated at 16 MGD with two 8 MGD treatment trains. Treatment trains provide rapid mixing, flocculation, sedimentation, softening, and recarbonation. The treatment trains discharge into a common 16 MGD filter area. There are eight dual cell filters rated at 2.0 gallons per minute (GPM) per square foot with support gravel, sand, and anthracite. The original 8 MGD treatment plant was constructed in 1964 and expanded to 16 MGD in 2004.

In 2018, the city added ozone treatment between the existing sedimentation basins and the gravity filters. The ozone system equipment includes an ozone generator and power supply unit, liquid oxygen storage, vaporization, nitrogen boost, cooling water systems, ozone destruct system, ozone diffusion contacting facilities, and ozone quenching chemical feed.

The city has 7.5 million gallons of underground finished water storage at the WTP. The city's distribution system includes two elevated tanks with a total storage of 3.0 million gallons. The Coy Road Elevated Tank stores 1.0 million gallons and the Lallendorf Road Elevated Tank stores 2.0 million gallons.

Water distribution within Oregon is bounded by Brown Road to the south, Lake Erie shoreline to the north, the City of Toledo corporation line to the west, and North Curtice Road to the east. The city sells potable water to the Village of Genoa in Ottawa County, Northwest Water & Sewer District in Wood County, and Lucas County. The distribution system is comprised of approximately 149 miles of distribution water line and 17 miles of trunk water line.

The existing Seaman Road water line is an 8-inch, cast iron distribution water line that was constructed in phases from 1954 to 1968. This water line section is prone to breakage, with 114 breaks recorded on the 14,568 linear feet (LF) of water line. The Seaman Road distribution water line serves both the City of Oregon Municipal and Recreation Complex and Clay High School. Additionally, the eastern end of the water line is a dead end, which can result in poor water quality, including the formation of disinfection byproducts (DBP).

The existing Norden Road water line is an 8-inch, cast iron distribution water line that was constructed in phases from 1964 to 1965. This water line section is prone to breakage, with 25 breaks recorded on the 3,497 LF of water line. The southern end of the water line is a dead end.

The existing Wynn Road water line is an 8-inch, cast iron distribution water line that was constructed in 1964. This water line section is prone to breakage, with 43 breaks recorded on the 4,282 LF of water line.

Project Description

The proposed project (see Figure 2) will replace approximately 22,000 LF of existing 8-inch cast iron distribution with 8-inch PVC water line along Seaman, Norden, and Wynn roads. Approximately 4,000 feet of new 8-inch water line will also be extended from the dead-end of Seaman and Norden roads and connect to existing water lines to create a looped system. The project will include the construction of distribution water lines, including hydrants, and main line valves. Construction activities will include open-cut and trenchless installations in previously disturbed rights-of-way (streets, driveways, and areas of buried utilities) that otherwise support no wetlands, forested areas, or aquatic habitat.

Implementation

The total estimated project amount is \$3,529,458, with an expected \$450,000 grant and a \$450,000 zero-percent loan from the Ohio Public Works Commission to fund a portion of the project. The remaining estimated loan amount for the project is \$2,629,458, which Oregon proposes to borrow from the WSRLA. The project service area qualifies for the standard long-term WSRLA below-market interest rate on 20-year loans, which for October is 2.88 percent (WSRLA loan interest rates are set monthly, and the rate may change for a later loan award). Borrowing at 2.88 percent will save Oregon approximately \$411,000 over the life of the loan compared to the current market rate of 4.13 percent.

Debt for the project will be repaid from the city's Water Construction Fund and Water Revenue Fund without rate increases for the specific areas served by the improvements. The local median household income (MHI) is \$62,409. Under the water rates that are effective in 2023 and based on a

usage of 7,756 gallons of water per month, the average residential water bill is \$22.12 per month, or \$265 per year. This represents 0.43 percent of the MHI, as compared to the state average of 1.2 percent.

Public Participation

Oregon sent the affected residents and businesses a letter explaining the project prior to the final design, and additional mailings will be sent prior to commencement of construction. In addition, Oregon has discussed the project at board meetings that were open to the public, and project information will be present on Oregon's website. Given the limited potential environmental impact of the project and the lack of a rate increase or property assessments, this is considered adequate public participation.

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing water distribution system, which involves the replacement of aged water lines prone to breaks, and the creation of water line loops within the system to improve water quality. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will require no specific impact mitigation, since sensitive resources such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, or threatened or endangered species are not present in the project area, and as the project involves the installation of water distribution lines in road rights-of-way where the roads and rights-of-way will be restored to their pre-project grade and condition.

Will have no effect on high-value environmental resources, as the project area includes road rights-of-way adjacent to residential lots and farm fields, with asphalt roads and some existing utilities, where no high-value environmental resources are present.

Is cost effective, as replacement of the water distribution lines will help to minimize water losses and ensure continuous potable drinking water supply to residents located in the project area at a reasonable cost.

Is not a controversial action, as user rates will not be increased as a result of this project, adverse impacts to environmental resources are unlikely to occur, and Ohio EPA is unaware of any public opposition to the project.

Does not create a new, or relocate an existing discharge to surface or ground waters, does not create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing water source, or substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters, as no discharge points or pollutant loading will be part of the project. The project does not require the expansion of Oregon's water treatment facility beyond its current capacity or require the addition of a supplementary water supplier, so it will not require a change in water withdrawal.

Will not provide capacity to serve a population substantially greater than the existing population, as the project scope is limited to installing water lines to create loops and redundancy. Little population change is anticipated during the 20-year planning period.

Contact information

R. Eric Schultz
Division of Environmental & Financial Assistance
Ohio Environmental Protection Agency
PO Box 1049
Columbus, Ohio 43216-1049

Phone: (614) 644-3713
email: eric.schultz@epa.ohio.gov



Figure 1. Project general area

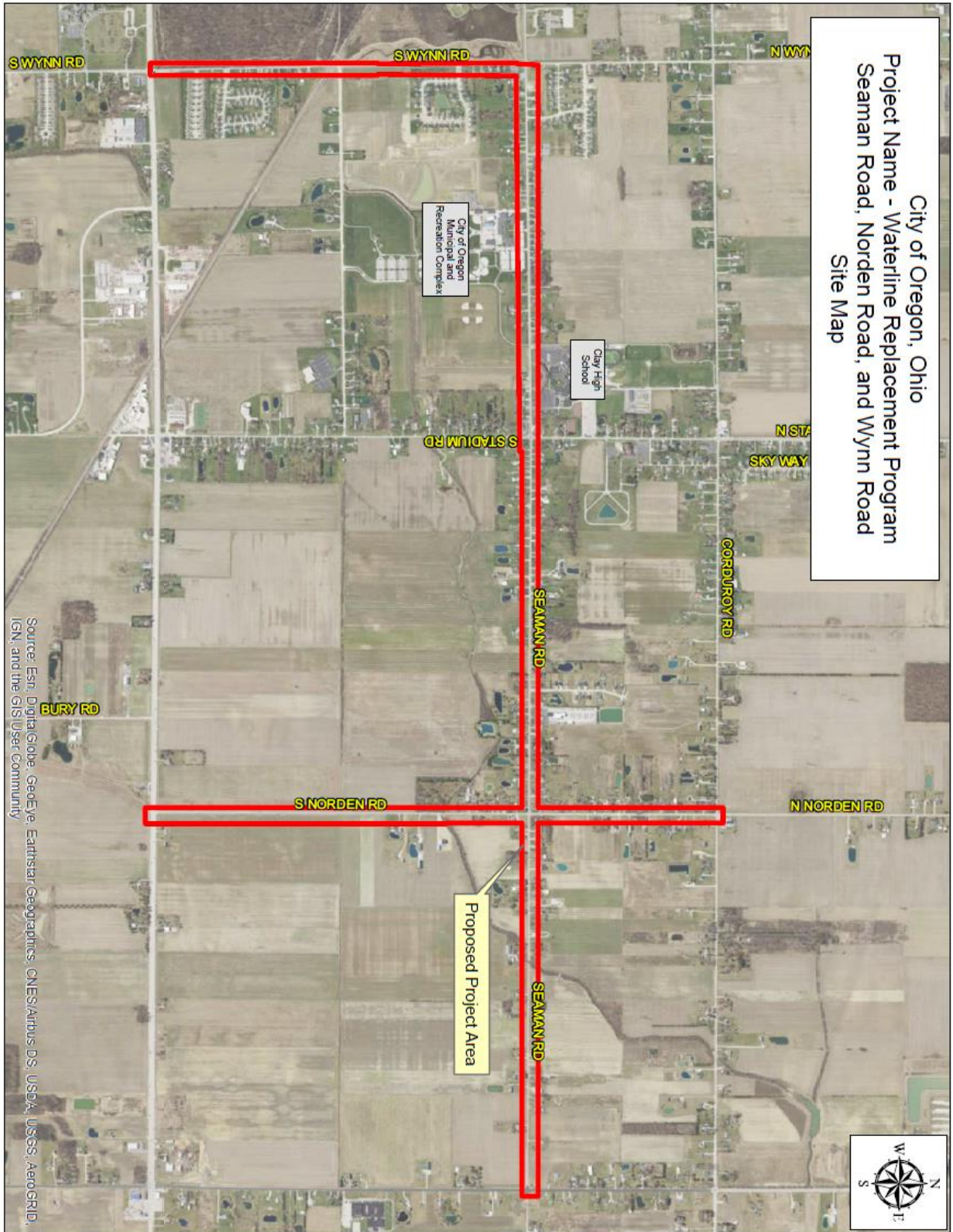


Figure 2. Specific project area