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memorandum

date August 14, 2017

to Debra Lambeth, Oregon Health Authority (OHA)
Bob Patterson, City of Pendleton

from Susan Cunningham

subject City of Pendleton Water Improvement Projects EID – Response to OHA’s Comments

SUMMARY

On June 29, 2017 an Environmental Information Document (EID) for the City of Pendleton Water Improvement Projects was submitted to Oregon Health Authority. On July 13, 2017 Debra Lambeth submitted to Susan Cunningham (Environmental Science Associates) a list of comments to be addressed before OHA can issue an Initial Finding of No Significant Impact (FNSI).

The following is a list of comments received on the Draft EID and a corresponding response on how the EID was modified to address the comment (Table 1). An additional change to the Draft EID is that the City is no longer requesting State Drinking Water Revolving Loan Funds (SDWRLF) for interim pump stations (IP-) and interim reservoirs (IR-). As a result, these projects have been removed from the EID. Table 1 includes responses to each OHA comment and includes a page number reference for the revisions associated with each comment.

The majority of OHA comments related to the precise number of projects included in the EID. The number of 65 projects in the EID that the City is requesting SDWRLF for is organized as follows:

- Outside of existing footprint – 20 projects are located in less disturbed/developed areas; the remaining 45 projects are located entirely within an existing road prism fill pad, or other fundamentally developed area.
- New infrastructure – 19 of the proposed projects are new infrastructure; the remaining 46 projects (43 pipes and 3 pump stations) are either upgrades or replacements.
- Potential impacts to environmental resources – 14 water system projects required further review for potential impacts to environmental resources (Table 2 in EID); the remaining 45 projects would not affect any protected resources for the reasons described on page 9 of the EID.

Table 1. OHA Comments (July 13, 2017) and ESA Responses

Number	Comment	Response
1.	<u>Document Organization</u> – The page number sequence is off between pages 9 and 14 which creates confusion for the reader.	The page numbers have been corrected to accurately sequence the order of pages throughout the document.
2.	<u>Section 2.2, paragraph 2:</u>	
2.a	The first sentence states that there are 75 proposed projects which does not match what is stated in Section 1.1 or total number of projects listed in Appendix B.	The number of projects has been reviewed and revised, and are now accurately described in the EID. The first sentence of the second paragraph of Section 2.2 has been revised to state a total of 65 projects, as found on page 2. This also matches the total number of projects listed in Appendix B.
2.b	Second sentence - If there are 67 projects and 47 are located within an existing developed area, then the remaining sites in less developed areas should be 20, not 16 as stated.	The number of projects has been reviewed and revised, and are now accurately described in the EID. The second sentence of the second paragraph of Section 2.2 has been revised to state a total of 20 projects that are located in less disturbed/developed areas, as found on page 2.
2.c	Second and third sentences – The numbers also do not add up between these two sentences. It states that there are 13 new facilities and 43 upgrades or replacements which only adds to a total of 56 projects.	The number of projects has been reviewed and revised, and are now accurately described in the EID. The second and third sentences of the second paragraph of Section 2.2 have been modified into one complex sentence that has been revised to reference 19 new infrastructure projects and 46 project upgrades (for a total of 65), as found on pages 2-3.
2.d	Second sentence – I would like this sentence to be expanded to better list the new facilities that will be constructed. From our follow-up conversations, I do not believe they are all listed here. Please list all new projects in this section. This is what I came up with by looking at Appendix B: - 14 new water mains (IM-50, IM-51, IM-54, M-4, M-19, M-32, M-33, M-34, M-36, M-35A, M-35B, M-48, M-53, T-56) - One new well (either 9A or 9B) - Three new pumps stations (IP-1, IP-2 and P-3) - Two New Reservoirs (R-1 and IR-2?) – I am still unclear as to which of the planned reservoirs are included in the EID. So, list them in this section as appropriate.	The second sentence of the second paragraph in Section 2.2 has been expanded to include a list of all new projects proposed in this EID, as found on pages 2-3. Both interim pump stations (IP-1 and IP-2) and the interim reservoir (IR-2) have been removed from the EID since the City will not be using SDWRLF. The only planned reservoir included in this EID is Project ID R-1.
2.e	Last sentence – References Figures 1a-1d, which were not included in the revised EID version submitted on 6/29/17. A different set of figures were included.	The last sentence of the second paragraph in Section 2.2 has been revised to read "refer to figures provided in Appendix A for maps of individual water project locations and Appendix B which includes a summary of all of the proposed projects," as found on page 3. Figures have also been revised to accurately show which projects are included in the EID.
3.	<u>Section 2.2.2:</u>	
3.a	If any of the following projects will occur outside the existing road prism, they should be described in Section 2.2.2: IP-1, IP-2, R-1 and IR-2. Otherwise, they should be called out in Section 2.2.1.	Projects IP-1, IP-2, and IR-2 are no longer included in this EID and thus are not included in the EID. Project ID R-1 is described in the last paragraph of Section 2.2.2, as found on page 4.
3.b	Second paragraph - References Figure 1d, which was not included in the revised version.	The language in paragraph 2 of Section 2.2.2 has been revised to reference Appendix A, rather than figure 1d, as found on page 3.

Number	Comment	Response
4.	<u>Section 2.3:</u>	
4.a	Third Sentence – states that 50 projects involve the replacement or upgrading of existing pipes. This number doesn't seem to match Section 2.2.	The third sentence of Section 2.3 has been revised to reference a total of 46 projects that are upgrades, as found on page 4.
5.	<u>Section 3:</u>	
5.a	First paragraph – In the first sentence please add the following language: All 67 projects <i>identified in Appendix B</i> were evaluated to identify existing environmental conditions.	The first sentence of the first paragraph of Section 3 has been expanded to include the words "identified in Appendix B," as found on page 4.
5.b	Sections 3.3 and 3.4 - References Figures 1a-1d, which were not included in the revised EID version.	In Sections 3.3 and 3.4, any reference to Figures 1a-1d have been revised to instead reference the figures that are contained in Appendix A, as found in pages 7-8.
6.	<u>Section 4:</u>	
6.a	Second paragraph, 4 th sentence – Please add the following language: Each of the 67 proposed projects <i>identified in Appendix B</i> were evaluated individually.	The fourth sentence of the second paragraph of Section 4 has been expanded to include the words "identified in Appendix B," as found on page 9.
6.b	Third paragraph – It states that Table 2 summarizes 14 projects which require further review. Seems like there are 18 listed in Table 2.	The third paragraph of Section 4 has been revised to reference a total of 14 projects which require further review, as found on page 11.
6.c	Table 2 – Appendix B lists project M-47 as having farmland considerations. Should it also be listed in Table 2?	M-47 is the Project ID for a project that has already been approved for a Categorical Exclusion by OHA in February 2017. This project has been removed from the EID
6.d	Table 2 – If project P-1 is included in this table. Why not project R-1? Isn't the new reservoir site at the same location as P-1?	Project ID R-1 and Project ID P-1 have been removed from Table 2 of Section 4 as they are not located within EFU.
6.e	Same thing for the IP-2 project, shouldn't it include the IR-2 portion since the reservoir is at the same site?	Projects IP-1, IP-2, and IR-2 are no longer included in this EID.
7.	<u>Appendix B:</u>	
7.a	Project IP-2 – Please add the City's project ID # for the reservoir portion of this project, IR-2.	Project ID IR-2 is no longer included in this EID.
7.b	Project P-1/R-1 – Please add a project description for R-1 in the description column.	Project ID R-1 is now included in Appendix B in alphabetical order, following P-5.
7.c	Project P-3 is missing from this version of Appendix B. It was there in the older version.	P-3 is now included in Appendix B in alphabetical order, following P-1.