

LIMITED ENVIRONMENTAL REVIEW

A. Project Identification

Project Name: Kitty Todd Preserve Wetlands Addition 2015, WR391468-0017
Implementer: The Nature Conservancy
Attn: Terry Seidel, Director of Protection
6375 Riverside Drive, Suite 100
Dublin, OH 43017

Sponsoring Project: Toledo – E3 International Park Storage Pipeline, CS390915-0113
Address: The Hon. Paula Hicks-Hudson, Mayor
City of Toledo
One Government Center
640 Jackson Street, Suite 2200
Toledo, OH 43604

B. History and Existing Conditions

The Nature Conservancy (TNC), collaborating with the City of Toledo, has requested funding to acquire and restore high quality wetlands in the Oak Openings region of western Lucas County. Toledo has requested \$27,000,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) for the “E3 International Park Storage Pipeline” project and has agreed to sponsor the Kitty Todd Preserve Wetlands Addition 2015 land purchase by participation in the Water Resource Restoration Sponsorship Program (WRRSP). The WRRSP provides a portion of the interest Toledo would otherwise pay on its WPCLF loan to the Kitty Todd Preserve project. The properties to be purchased total approximately 40 acres of high quality Category 3 Oak Openings wetlands and adjacent upland buffer that will be protected in perpetuity by an Environmental Covenant.

The Oak Openings region of northwest Ohio and southeast Michigan prior to European settlement consisted of open wet prairies in low areas and black oak savannahs on uplands. This landscape was significantly modified as land was cleared and drained for agriculture, leaving only remnants of the original wet prairie and swamp forest habitats and rare species of plants and animals. Since the 1930s, conservation organizations have worked to preserve the remnant wet prairies and restore the original ecosystem with the goal of permanently conserving a biological corridor that stretches through the remnant Oak Openings. The Nature Conservancy (TNC), Toledo MetroParks, and the Ohio Department of Natural Resources (ODNR) have acquired more than 9,000 acres of Oak Openings habitat in several preserves. This land acquisition will increase the protected area and help consolidate a larger block of preserved high quality habitat.

C. Project Description

Adding to parcels acquired by TNC since 2009 through the WRRSP, this project will acquire approximately 40 acres of prioritized land, primarily high-quality wetlands and adjacent buffer (Figure 1). The TNC Management Plan lists the priority acreages for acquisition and describes the restoration and management steps for each new addition to the Kitty Todd Preserve. Because the general area of acquisition and the conservation goals have been the same for each round, the Management Plan for each round has been the same as the others with the exception of the priority acreages. The Management Plan require the uplands to be managed to oak savanna and the wetlands to mesic sand tallgrass prairie or twig-rush wet prairie, depending on the local hydrology. Restoration will include trash removal; tile abandonment; hazardous waste cleanup; structure demolition; the removal of invasive plants using herbicides or by hand clearing; cutting overgrown hardwoods; mowing; seeding; planting; and prescribed burns to mimic the effect of natural wildfires. Long-term management will entail these activities and monitoring of vegetation plots to track responses to management techniques and allow adjustment. The future use of all acquired land will be governed by an Environmental Covenant between TNC and Ohio EPA that governs all aspects of perpetual long-term management, including use restrictions. The Covenant is transferable in perpetuity.

D. Estimated Project Costs

Based on the appraised value of the prioritized parcels identified for purchase, land acquisition will total \$404,500 and restoration \$60,000 for a total project cost of \$464,500. This amount will be available from the sponsoring Toledo E3 International Park Storage Pipeline WPCLF loan. In exchange for sponsoring this project, Toledo will receive an interest rate reduction of 0.1% on its loan, and a portion of the interest that otherwise would be charged to the wastewater loan will be advanced to TNC for this WRRSP project.

E. Project Schedule

Assuming a July 2016 WPCLF loan award for the E3 International Park Storage Pipeline project, WRRSP funds will be available to TNC in August 2016 and land acquisition and restoration will occur as property closings are scheduled.

F. Public Notification

There have been a number of public outreach efforts in Oak Openings over the years and conservation efforts generally have solid local support.

Ohio EPA will post this Limited Environmental Review (LER) and Finding of No Significant Impact (FONSI) on the Agency's website and provide it upon request.

Supporting documentation for the LER decision is available from the agency contact identified at the end of this document. Ohio EPA is unaware of any opposition to this project.

[Project Location](#)

G. Conclusion

Because the proposed WRRSP project is sufficiently limited in scope and meets all applicable criteria, a Limited Environmental Review is warranted. Specifically, the acquisition of land for protection of wetlands and other high quality habitat in the Oak Openings region of Lucas County constitutes a project type that qualifies for an LER because it meets the following criteria:

- *It is expected to have no adverse environmental effect* because no construction will be involved. The planning activities for the project identified no potential adverse impacts on the quality of the human environment or on 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. In fact, the proposed project will benefit the environment by the perpetual protection of land that may otherwise be developed.
- *It will not require specific impact mitigation* because the proposed project involves wetland and upland habitat preservation, which is not a land-disturbing activity.
- *It will have no adverse effect on high value environmental resources* because there will be no disruption to the existing site conditions. While sensitive species are known to be present on the property, the purpose of the project is to preserve them and their habitats. There will be no adverse effect on surface water because there will be no construction activity and no discharge involved. Furthermore, because of this, impacts to known or unknown archaeological or historical resources are not expected.
- *The costs are reasonable* because it will provide permanent protection of high quality wetlands and upland habitat in return for the funds expended.
- *It is not a controversial action* because land acquired through the WRRSP is from willing sellers and involves no additional cost to ratepayers. In fact, the WRRSP discount will result in a slight decrease in Toledo's total loan repayment thus providing a financial benefit to customers.

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It will not create a new, or relocate an existing, discharge to surface or ground waters, nor will it result in any increase in the volume of discharge or loading of pollutants because it is a habitat preservation project and, therefore, does not involve a point source discharge.

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It will not provide capacity to serve a population substantially greater than the existing population because it does not involve the upgrade or extension of any drinking water or wastewater facilities.

H. For more information, please contact:

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