

May 2, 2025

Abigail Elder, City Manager
City of Hood River, PWS # 4100385
211 2nd Street
Hood River, OR 97031

Sent by email only

Re: Extended compliance schedule to remove lead goosenecks

To Abigail Elder:

Oregon Health Authority's Drinking Water Services (DWS) has received a proposed extended schedule for the removal of all lead-jointed pipe and lead goosenecks within the City of Hood River (the City)'s water system by 2036.

In 1985, Oregon Administrative Rules prohibited the use of lead pipes and required that public water systems identify and remove any lead piping, including goosenecks, within their systems. Systems with known lead components were put on a compliance schedule to remove the lead. Hood River is the only city in Oregon that has not yet completed this work.

In 2016, DWS worked with the City to create a schedule documenting the approximate amounts of lineal feet of lead-jointed pipe the City anticipated removing each fiscal year (July 1 to June 30), with the entire estimated 34,620 feet of lead-jointed pipe, and associated goosenecks, removed by 2031. In late 2024, the City informed DWS that due to technical and financial barriers, including staffing and funding limitations, they would not be able to meet their commitment and requested a meeting to discuss an extension.

After discussing this matter with DWS on April 8, 2025, the City sent DWS an updated proposed schedule on April 28, 2025, summarized below. **DWS hereby approves this schedule.** All lead components will now be removed by 2036. Lead is a significant health concern, particularly for children, and this work needs to be prioritized and completed in the fastest timeframe possible. As discussed during the meeting, failure to adhere to this schedule could result in DWS initiating formal enforcement, which could include the assessment of civil penalties.

Until project completion, by August 31st of each year the City will report to DWS the actual numbers of lead goosenecks and lineal feet of lead-jointed pipe removed during the previous fiscal year. DWS

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may require an accelerated schedule for removing the lead goosenecks if future lead tap sample results exceed the current and pending action levels of 15 and 10 ppb, respectively.

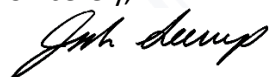
Table: Extended Lead-Jointed Pipe/Gooseneck Replacement Schedule; City of Hood River (PWS # 4100385).

Date	Length of Pipe to be Removed (Lineal Feet)
July 1, 2015 – April 28, 2025	14,121 (completed)
2024-25	1138
2025-26	1437
2026-27	1660
2027-28	1840
2028-29	1765
2029-30	2030
2030-31	1595
2031-32	1745
2032-33	2050
2033-34	1815
2034-35	1475
2035-36	1949
Total	34,620

The service line inventory submitted by the City on October 9, 2024, indicated that all service lines are known to be non-lead; any lead service lines discovered during the work will need to be replaced on both the public and private side up to the point of premise plumbing and OHA must be notified of the discovery.

If you have any questions or concerns, please contact me at (503) 812-4193 or josh.seerup@oha.oregon.gov. Your attention to this important public health matter is imperative.

Sincerely,



Josh Seerup
Drinking Water Specialist
OHA Drinking Water Services
josh.seerup@oha.oregon.gov.

Cc: Adam Schmid, Director of Public Works, Management Analyst Haley Ellett; Project Manager Randy Achziger; Operations Manager Kelby Johnson; Ian Stromquist, REHS, Hood River County Environmental Health