

June 10, 2013

Notice of Issuance of a Limited Environmental Review and Final
Finding of No Significant Impact to All Interested Citizens,
Organizations and Government Agencies

City of Cincinnati, Greater Cincinnati Water Works (GCWW)
Madison Road - Dana to Drakewood Water Main Replacement Project, FS390255-0032

The purpose of this notice is to advise the public that Ohio EPA has reviewed the referenced project and finds that neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to complete the environmental review of the project. Instead, this project meets the criteria for a Limited Environmental Review (LER). These criteria are summarized below in this document and in the attached LER.

This project involves the replacement of a number of older, cast iron water mains in the GCWW distribution system along Madison Road. All of these water mains date back to the year 1907. The existing 16-inch and 36-inch diameter water distribution mains are being replaced with new 16-inch and 48-inch distribution mains. In addition, any service branches containing lead encountered with this main replacement will also be replaced.

The project will take place within existing right-of-way, within existing paved areas, which has been previously disturbed for maintenance of the roadway and the existing distribution system. Replacement of the existing water mains will improve drinking water quality parameters in the immediate area and reduce unaccounted for water loss, thereby improving system efficiency.

The Drinking Water Assistance Fund program requires the inclusion of environmental factors in the decision-making process for project approval. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed action in its review and approval process. Environmental information was developed as part of the project plan, as well as through the project plan review process. A subsequent review by this Agency has found that the proposed action does not require the preparation of an EA or an SS.

Our environmental review concluded that because the proposed project is limited in scope and meets all applicable criteria, a Limited Environmental Review is warranted. Specifically, the project entails the replacement of existing, deteriorating waterlines, and is not for the construction of new or expanded facilities.

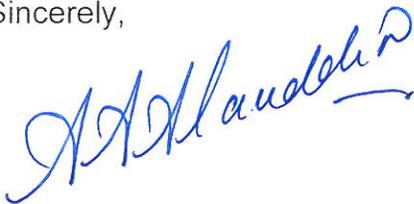
Furthermore, the proposed project:

- Has no significant environmental effect;
- Does not require extensive specific impact mitigation;
- Has no effect on high value environmental resources;
- Is cost effective;
- Is not a controversial action;
- 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;
- Will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters; and
- Will not provide capacity to serve a population substantially greater than the existing population.

The LER presents additional information on the proposed project, its costs, and the basis for our decision. Further information can be obtained by calling or writing the contact person listed on the back of the LER.

Upon issuance of this determination, a loan award may proceed without being subject to further environmental review or public comment, unless information is provided which determines that environmental conditions for the proposed project have changed significantly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alauddin A. Alauddin". The signature is stylized and includes a horizontal line at the end.

Alauddin A. Alauddin, Acting Chief
Division of Environmental &
Financial Assistance

Attachment

Cc: Gina Hayes, SWDO-DDAGW
Amy Walkenspaw, DEFA
Sue Farmer, OWDA
File

LIMITED ENVIRONMENTAL REVIEW

A. Project Identification

Name: City of Cincinnati
Greater Cincinnati Water Works (GCWW)
Madison Road Water Main Replacement Project

Address: Carel Vandermeijden, GCWW Chief Engineer
4747 Spring Grove Avenue
Cincinnati, Ohio 45232

WSRLA No.: FS390255-0032

B. Project Background and Existing Need

The City of Cincinnati GCWW has applied to Ohio EPA's Water Supply Revolving Loan Account (WSRLA) for low-interest financing of a proposed project involving the replacement of 14,500 feet of water mains along Madison Road. This document summarizes Ohio EPA's WSRLA-required environmental review of the proposed water main project.

GCWW provides about 136 million gallons of water a day through approximately 3,100 miles of water mains to most of Hamilton County and parts of Butler and Warren counties in Ohio, and to Boone County in Kentucky. GCWW supplies water from two sources. The Miller Treatment Plant treats surface water from the Ohio River, and the Bolton Treatment Plant treats ground water from wells in the Great Miami Aquifer, which is located in southern Butler County. Water from the Miller and Bolton treatment plants is delivered to customers in an open distribution system, which means water from both sources is mixed in the water mains.

The proposed project is not expanding service of the City's water distribution system, but rather allows the City to replace a number of older, cast iron water mains that date back to the year 1907. Since 2009, the 36-inch diameter water main has had three repairs due to joint failures. Replacing 14,500 feet of unlined cast iron main will help reduce unaccounted for water loss, thereby improving system efficiency. In addition, any service branches containing lead encountered with this main replacement will also be replaced.

C. Project Descriptions

This project involves the replacement of the existing 16-inch and 36-inch diameter water distribution mains with new 16-inch and 48-inch distribution mains along Madison Road from Dana Avenue to Drakewood Avenue, Cincinnati, in southeastern Hamilton County, Ohio (see Figure 1).

The project will take place within the existing right-of-way, within existing paved areas, and is part of GCWW's infrastructure management program. All work will occur within

the existing roadway. The replacement water mains will be installed using a standard trench methodology, including saw cutting of the existing pavement, standard excavation of the trench, pipe installation, backfill and street restoration. A separate pipe trench will be excavated for each water main segment, ranging from 3-6 feet wide. The depth will vary along the project route.

The project has been divided into two separate phases, but the same contractor will construct each phase.



Figure 1: GCWW Madison Road Water Main Replacement Project Site Map

D. Estimated Project Costs

The project costs are expected to be funded with a low-interest loan through the State of Ohio's Drinking Water Assistance Fund (specifically the Water Supply Revolving Loan Account), administered by Ohio EPA. The estimated project cost is \$7,627,549.66.

GCWW qualifies as a non-disadvantaged system with affordability points, which means it qualifies for a 2.0% interest rate for up to 20 years. By using the WSRLA instead of market rate (4.34%) funding, GWCC will save its customers approximately \$2,196,000 in interest costs.

The WSRLA loan will be repaid through revenue generated by GCWW's user charge system. The Cincinnati City Council passed an ordinance on December 14, 2012 to increase water revenues by 7.25%. Based on the new user charge rates, the average residential customer within the City of Cincinnati, using an assumed 2,807 cubic feet (28.07 CCF) of water per quarter, would pay a quarterly bill of \$75.83 (\$2.28 per CCF used and \$11.83/quarter service charge). This quarterly rate translates to an average annual (inside Cincinnati) residential expenditure of \$303.32 for finished water. This project is within the City of Cincinnati, and the rate calculations were based on GCWW's user rates for customers in such areas. Different service areas will have different user charges. Please see www.cincinnati-oh.gov for more information on water service charges.

Cincinnati's annual median household income (MHI) is \$33,855, so the average annual user charge within the project area of \$303.32 is 0.9 % of the median household income for the project area. This is well below the Ohio average of 1.2% (the 2008 state average annual user charge for water supply services as a percentage of the 2000 Ohio MHI).

Cincinnati's projected average annual user cost is below the range of neighboring communities, namely: Addyston (population 481) - \$528, Lockland (population 3,488) - \$385, and Wyoming (population 8,347) - \$572. The City of Cincinnati's population is 378,259.

E. Project Schedule

It is expected that the WSRLA loan for this water main project will be awarded in June 2013. Construction for the project is proposed to be completed by June 1, 2014.

F. Public Notification

The Madison Road project is included as a line item in the entire GCWW capital program, which is included in the City's recommended budget. The budget is posted online at www.cincinnati-oh.gov/finance/budget/. The City Council approves the entire capital budget as a whole for GCWW, not individual projects. No meetings with the public were held during design. However, before GCWW starts construction on the project, they send a letter to every resident and business along the project to notify them about the construction, the schedule, traffic detour information and contact information if they have questions.

Ohio EPA will issue a copy of its Limited Environmental Review (LER) decision and Finding of No Significant Impact for this project to interested parties. Supporting documentation for the LER decision is available for public inspection on Ohio EPA's website (www.epa.ohio.gov/defa/Home.aspx) or upon request at the following address:

Ohio EPA
Division of Environmental and Financial Assistance
P.O. Box 1049
50 W. Town Street, Suite 700
Columbus, Ohio 43216-1049

G. Planning Information

The following agencies have reviewed and commented on the facilities planning information for the proposed project:

Ohio Historic Preservation Office
Ohio Environmental Protection Agency
Ohio Department of Natural Resources

No opposition to the project is known at this time.

H. Conclusion

The proposed water main replacement project meets Ohio EPA's general criteria for a Limited Environmental Review; namely, it is an action in a portion of an already existing water system that is designed to repair or upgrade existing facilities. Furthermore, the project meets the following, specific qualifying criteria for a LER:

- It will have no significant adverse environmental effect, as the proposed project will involve the installation of new waterlines in previously-disturbed areas within existing right-of-way and within existing pavement areas. The planning activities for the project identified no potentially significant adverse impacts on the quality of the human environment or on sensitive resources such as floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeological sites, or threatened or endangered species;
- It does not require extensive specific impact mitigation, as it will involve a shallow-trench installation of waterlines within road rights-of-way in existing developed areas, previously disturbed by the construction of roads. Thus, environmental impact mitigation is not expected to be extensive or elaborate, consisting primarily of construction best management practices and applicable traffic controls;
- It will have no effect on high value environmental resources, as it will involve construction in an existing developed area; no high value environmental resources were found during the environmental review, or would be expected to occur;
- It is cost-effective, as the project replaces a number of older, cast iron water mains that date back to the year 1907. These replacements will improve drinking

water quality parameters in the immediate area and provide more reliable service to customers;

- It is not a controversial action, as it will only slightly increase user charges, it will not create significant adverse impacts, and there is no known opposition to the project at this time;
- It will not create a new, or relocate an existing, discharge to surface or ground waters; will 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; will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters; and will not provide capacity to serve a population substantially greater than the existing population, since the proposed project merely replaces existing water mains in the project vicinity, and does not involve any wastewater treatment activities (point source discharges, volumes of pollutants, etc.), any new water supplies, or capacity for significant expansion.

The planning activities for the project have identified no potentially significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources. Implementation of appropriate construction mitigation measures is required by the contract specifications, and construction activity will be limited to the paved streets and road rights-of-way. For the preceding reasons, Ohio EPA has made a Finding of No Significant Impact to the human or natural environments for this project.

- I. **For further information, please contact:**
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