Ohio EPA
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John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 6, 2012

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)
Clough Pike Water Main Replacement
FS390255-0024

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.

The proposed project involves the replacement of two older water mains in the GCWW distribution system along Clough Pike and Turpin Hills Drive in southeastern Hamilton County. These water mains date back to the mid-1950s. The existing 8-inch diameter water distribution mains are being replaced with new 8-inch and 12-inch diameter distribution mains, which will be installed in existing road rights-of-way. This construction project includes replacement of approximately 4,200 feet of water main.

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 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,

Gregory H. Smith, Chief
Division of Environmental &
Financial Assistance

Attachment

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

LIMITED ENVIRONMENTAL REVIEW

A. Project Identification

Name: City of Cincinnati
Greater Cincinnati Water Works (GCWW)
Clough Pike Water Main Replacement

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

WSRLA No.: FS390255-0024

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 water lines within the GCWW service area. This document summarizes Ohio EPA's WSRLA-required environmental review of the proposed water main replacement 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 projects will serve an existing need to replace older, higher maintenance, cast iron water mains in the GCWW distribution system, which date back to the mid-1900s. This project is part of GCWW's ongoing water main replacement program, which proactively addresses the older water mains in the distribution system.

C. Project Descriptions

Clough Pike Water Main Replacement Project:

The Clough Pike water main replacement project replaces two older water mains in the GCWW distribution system along Clough Pike and Turpin Hills Drive in southeastern Hamilton County (see map below). These water mains date back to the mid-1950s. The existing 8-inch diameter water distribution mains are being replaced with new 8-inch and 12-inch diameter distribution mains, which will be installed in existing road rights-of-way. This construction project includes replacement of approximately 4,200 feet of water main.

Clough Pike Water Main Replacement Project Area Map

Construction of the waterline replacement should be fairly straight-forward. A 6-foot wide trench with an average depth of approximately 4.5 feet will be dug in the existing road rights-of-way, very near the existing waterlines. The new waterlines will be installed, tested, and connected to the upstream and downstream portions of the existing waterlines that are to remain in operation. The remainder of the existing waterlines will be abandoned in-place. The new waterlines will be installed beneath the edge of pavement and under the pavement. The planned restoration consists of the placement of granular backfill below, around, and 12 inches above the top of the pipe. Controlled Density Fill material is backfilled on top of the granular backfill, and then followed by 11 inches of concrete and a final 2 inches of hot mix asphalt. It should be noted that the entire project area has been previously disturbed by the installation of the original waterlines, other existing underground utilities, roads, and development, so little adverse impact is expected.

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 $725,062.

GCWW qualifies as a non-disadvantaged system with affordability points, which means it qualifies for a 2% interest rate for up to 20 years. By using the WSRLA instead of market rate (4.19%) funding, GWCC will save its customers approximately $200,000 in interest costs.

The WSRLA loan will be repaid through revenue generated by GCWW's user charge system. The current user charge rates have been in effect since January 1, 2012. Based on the current user charge rates, the average residential customer within the City of Cincinnati's unincorporated area of Hamilton County, using an assumed 2,807 cubic feet (28.07 CCF) of water per quarter, would pay a quarterly bill of $94.79 ($2.85 per CCF used and $14.79/quarter service charge). It is not anticipated that the proposed project will necessitate an increase in the user charge rates. This quarterly rate translates to an average annual (Cincinnati unincorporated limits) residential expenditure of $379.16 for finished water. Since this project is within the unincorporated area of Hamilton County, 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 and the average annual user charge within the Clough Pike area is $379.16, which 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 332,572.

E. Project Schedule

It is expected that the WSRLA loan for this water main replacement project will be awarded in January 2013. The construction schedule for the project is listed below.

Project	Start	Duration
Clough Pike	12/1/13	180 days

F. Public Notification

GCWW produces an annual report to notify the public of progress that it is making in replacing its old, inadequate infrastructure. GCWW also maintains a very user-friendly website (http://www.cincinnati-oh.gov/water/), which is updated regularly to notify the public of projects and other current news.

The Cincinnati City Council passed an ordinance on June 26, 2012 to receive a loan from Ohio EPA for this project. GCWW will also notify residents along the project route with a resident notification letter a few weeks before the construction starts. This letter will describe the project, the affected streets, the construction schedule, the hours of

construction, traffic restrictions, and provide phone numbers to contact GCWW with project concerns.

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 (http://www.epa.state.oh.us/defa/public_comment.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 only involve the installation of replacement waterlines in previously-disturbed 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 relatively simple, shallow-trench installation of replacement 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;

- It will have no effect on high value environmental resources, as it will involve construction in an existing developed area, where no high value environmental resources were found during the environmental review, or would be expected to occur;
- It is cost-effective, as replacement of these lines will help to economically ensure a continuous potable drinking water supply to residents at a reasonable cost, particularly compared to installation of an entirely new water distribution system, and will eliminate substantial water loss;
- It is not a controversial action, as it will not increase user charges or 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 replace waterlines in an existing developed area, 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. For the preceding reasons, Ohio EPA has made a Finding of No Significant Impact to the human or natural environments for this project. The project will provide improved water service that is safe and reliable for residents and businesses, and reduce treatment costs by reducing water loss due to leakage from old cast iron water mains.

I. For further information, please contact:

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