



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

December 3, 2012

Notice of issuance of a Limited Environmental Review and Finding of No Significant Impact to all interested citizens, organizations and government agencies

Greater Cincinnati Water Works – Water Line Replacement Projects:

**Knowlton/Dane/Fergus/Lingo/Ludlow/Mad Anthony
WSRLA Loan Number: FS390255-0028**

**McAlpin/Ludlow/Victor/Middleton/Chickasaw/Lafayette
WSRLA Loan Number: FS390255-0030**

**Vine Street and Woolper Avenue
WSRLA Loan Number: FS390255-0031**

The purpose of this notice is to advise the public that the Ohio Environmental Protection Agency (Ohio EPA) has reviewed the above-referenced projects and finds neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to implement the project as discussed in the attached Limited Environmental Review (LER). Therefore, a Finding of No Significant Impact is being issued for this project.

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 facilities plan, as well as through the facilities plan review process. A subsequent review by this Agency has found that the proposed action does not require the preparation of either an EA or an SS.

Our environmental review concluded that because the proposed project is limited in scope and meets all applicable criteria, a LER is warranted. Specifically, the project is for the installation of a diffused aeration system to reduce the levels of TTHMs along with the existing two booster pumps and chlorination facility.

The proposed project meets the following review criteria:

- it has no significant environmental effect;
- it does not require extensive specific impact mitigation;
- it has no effect on high value environmental resources;
- it is cost effective;

- it is not a controversial action;
- it does not create a new, or relocate an existing discharge to surface or ground waters;
- it 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a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing water source;
- it 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
- it will not provide capacity to serve a population substantially greater than the existing population.

The LER presents additional information on the proposed project, costs and basis for our decision. Additional information may be obtained by calling or writing the contact person named at the end of the LER.

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

Sincerely,



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

Attachment

cc: Gina Hayes, DDAGW, SWDO
Sue Farmer, OWDA
File

LIMITED ENVIRONMENTAL REVIEW

A. Project Identification

Project Name: City of Cincinnati
Greater Cincinnati Water Works (GCWW)
Knowlton/Dane/Fergus/Lingo/Ludlow/Mad Anthony water main replacement project;
McAlpin/Ludlow/Victor/Middleton/Chickasaw/Lafayette water main replacement project; and
Vine Street and Woolper Avenue water main replacement project.

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

WSRLA Loan No: FS390255-0028; FS390255-0030; and FS390255-0031

B. Summary/Existing Need

The Greater Cincinnati Water Works (GCWW) has applied to the Ohio Environmental Protection Agency (Ohio EPA), Division of Environmental and Financial Assistance (DEFA) for funding assistance through the Water Supply Revolving Loan Account (WSRLA) to replace approximately 25,237 linear feet of deteriorated and undersized cast iron water main. Replacement of the water lines will address public health concerns (i.e., leaching lead into drinking water) and undersized infrastructure in relation to increased urban development. All water line replacements will occur within street rights-of-way.

Because of their similarity in nature and proximity to one another, three projects for which funding assistance has been requested are included in this review. They are as follows:

- Knowlton/Dane/Fergus/Lingo/Ludlow/Mad Anthony water main replacement project;
- McAlpin/Ludlow/Victor/Middleton/Chickasaw/Lafayette water main replacement project; and
- Vine Street and Woolper Avenue water main replacement project.

GCWW provides approximately 136 million gallons of water per day through approximately 3,000 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: 1) the Miller Treatment Plant, which treats surface water from the Ohio River and supplies 88 percent of drinking

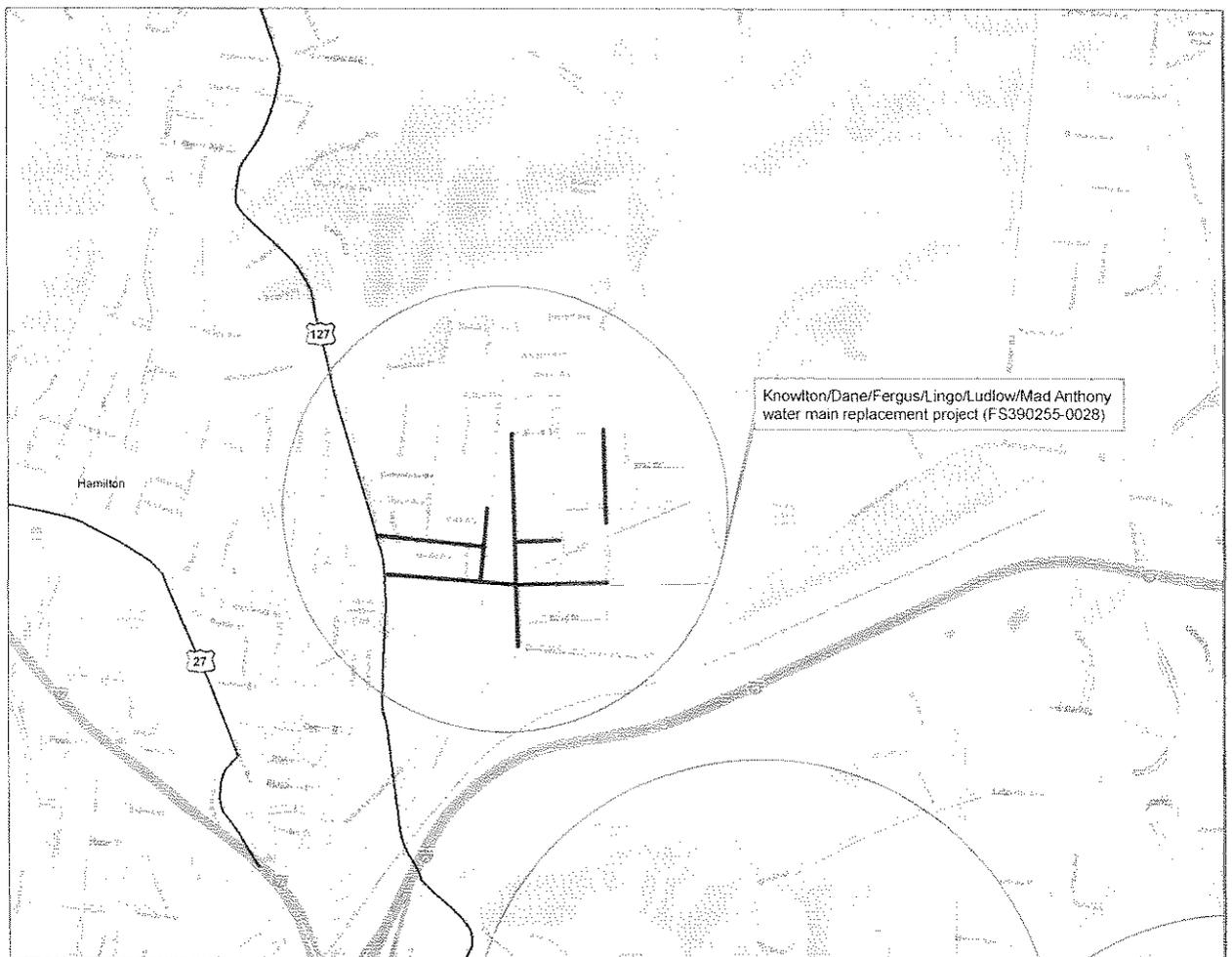
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water to GCWW's customers, including most of Cincinnati; and, 2) the Bolton Treatment Plant, which treats ground water from ten wells within the Great Miami Aquifer located in southern Butler County. Water from the Miller and Bolton treatment plants is delivered to customers in an open distribution system, which means it is mixed in the water mains.

These water main replacement projects are part of GCWW's infrastructure management program, which has a goal of replacing 31 miles of water line per year.

C. Project Description

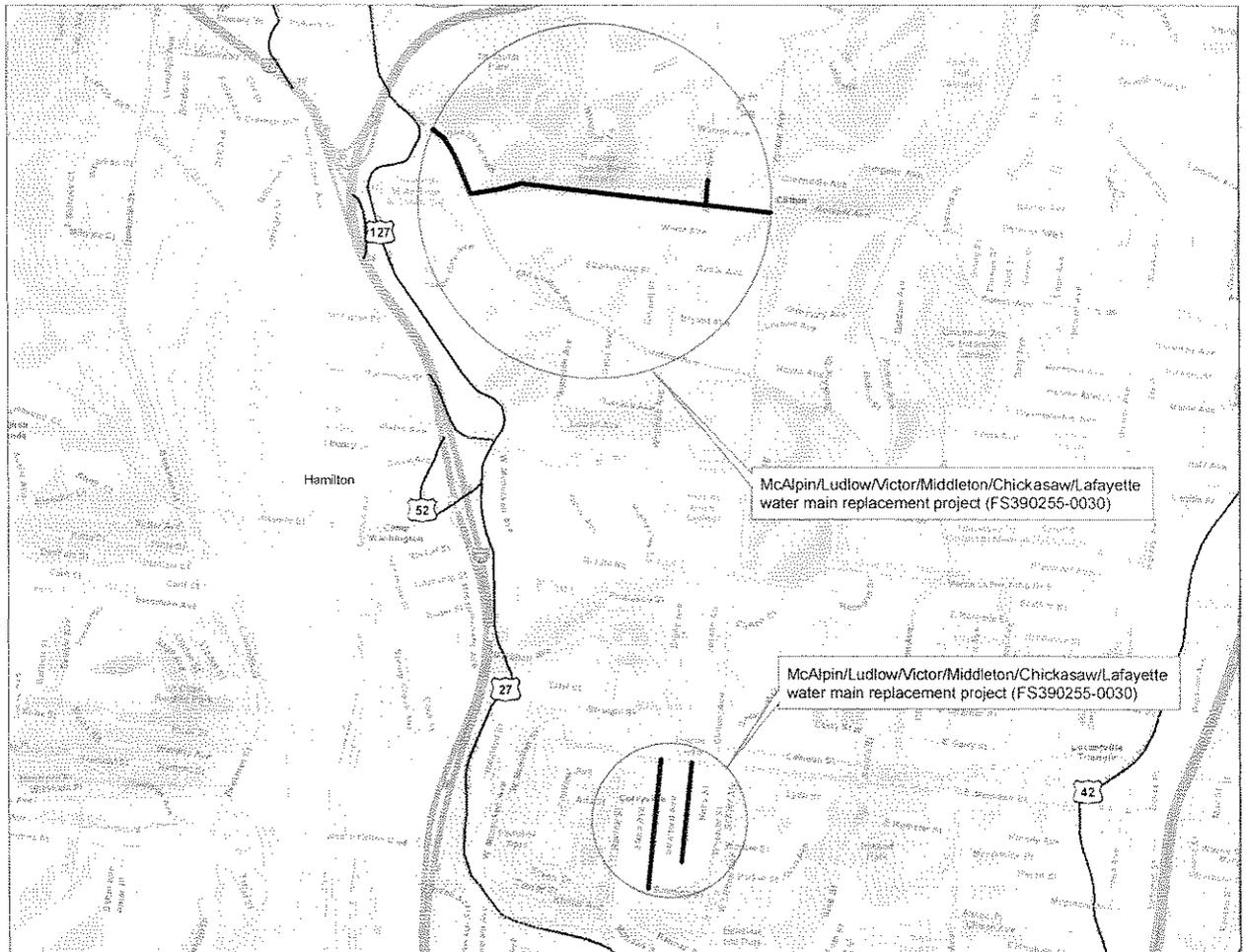
The Knowlton/Dane/Fergus/Lingo/Ludlow/Mad Anthony water main replacement project replaces approximately 7,037 linear feet (LF) of old water mains that were installed between 1923 and 1956. Existing six-inch diameter cast iron water main will be replaced with new eight-inch diameter lines in all of the aforementioned streets except Knowlton, where existing six-inch water main will be replaced with 12-inch diameter lines.



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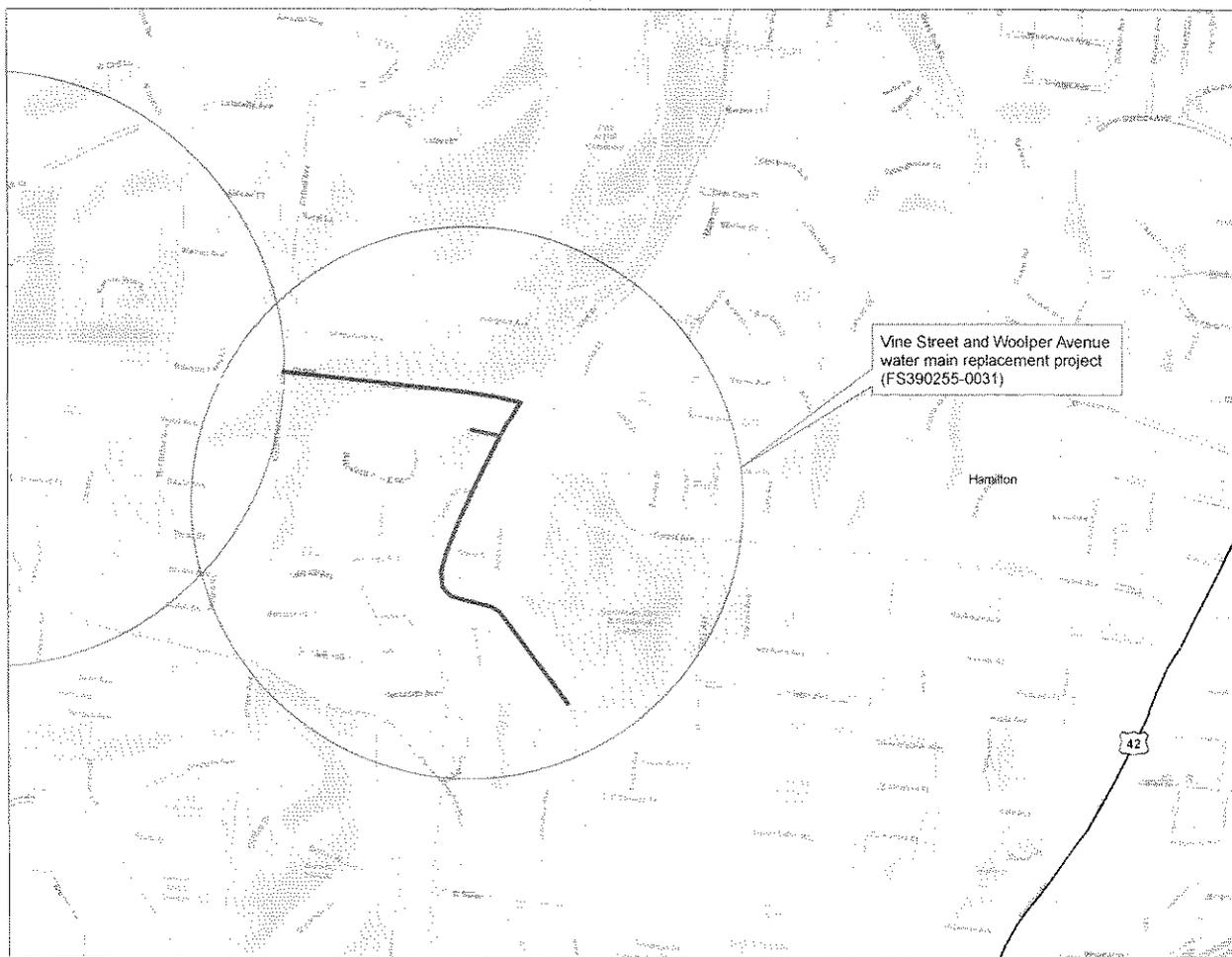
The McAlpin/Ludlow/Victor/Middleton/Chickasaw/Lafayette water main replacement project replaces 12,675 LF of old water mains that were installed between 1907 and 1925 as follows:

- in McAlpin Avenue, 4,475 LF of existing six-inch and 20-inch diameter water main will be replaced with a single new 12-inch diameter line;
- in Ludlow Avenue, 3,700 LF of existing six-inch and 20-inch diameter water main will be replaced with a single new 16-inch diameter line;
- in Victor Street, 1,901 LF of existing six-inch diameter water main will be replaced with new eight-inch diameter line;
- in Middleton Avenue, 264 LF of existing eight-inch diameter water main will be replaced with new eight-inch diameter line;
- in Chickasaw Street, 1,560 LF of existing six-inch diameter water main will be replaced with new eight-inch diameter line; and
- in Lafayette Avenue, 775 LF of existing six-inch and 20-inch diameter water main will be replaced with a single new 12-inch diameter line.



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The Vine Street and Woolper Avenue water main replacement project replaces 5,525 LF of old water mains that were installed in 1917. Existing six-inch diameter cast iron water main will be replaced with 12-inch diameter lines in Vine Street and Woolper Avenue. Both mains will connect to 12-inch mains recently installed in 2003 (Erkenbrecher) and 2004 (Clifton) and eliminate a bottleneck between them.



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 or WSRLA) administered by Ohio EPA. The total construction cost of the Knowlton/Dane/Fergus/Lingo/Ludlow/Mad Anthony water main replacement project is estimated to be \$1,200,000. The total construction cost of the McAlpin/Ludlow/Victor/Middleton/Chickasaw/Lafayette water main replacement project is estimated to be \$1,840,000. The total construction cost of the Vine Street and Woolper Avenue water main replacement project is estimated to be \$980,000. GCWW is a non-disadvantaged system with affordability points, which means it qualifies for a two percent interest rate for up to 20 years. Compared to market-rate (4.19 percent) financing, GCWW will save an estimated

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\$330,500, \$507,000, and \$270,000 on these three projects, respectively, by funding them through the WSRLA.

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, 2011. Based on the current 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 water bill of \$67.14, or \$1.96 per CCF used, plus a \$12.12 per quarter service charge. It is not anticipated that the proposed projects will necessitate an increase in user charge rates. This quarterly rate translates to an average annual (inside Cincinnati) residential expenditure of \$268.56 for finished water. These projects are located within the City of Cincinnati and the rate calculations were based on GCWW's user rates for customers inside Cincinnati. 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 house income (MHI) is \$33,855 and the average annual user charge within the city is \$268.56, which is 0.8 percent of the MHI for the project area. This is well below the Ohio average of 1.2 percent (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 within the range of other similarly-sized Ohio cities, namely: Cleveland (population 393,804) - \$305; Columbus (population 776,256) - \$389; and, Toledo (population 286,033) - \$134.

E. Project Schedule

It is expected that the WSRLA loan for the Knowlton / Dane / Fergus / Lingo / Ludlow / Mad Anthony water main replacement project will be awarded in December 2012. The project was bid on September 26 and construction, which is anticipated to begin in November 2012, is expected to take 180 days to complete.

The WSRLA loans for the McAlpin/Ludlow/Victor/Middleton/Chickasaw/Lafayette and Vine Street and Woolper Avenue water main replacement projects are expected to be awarded in February 2013.

F. Public Participation

GCWW is very proactive in terms of its public awareness for water main replacement projects. The annual reports notify the public of the progress that GCWW is making in replacing its old, inadequate infrastructure. In the 2009 annual report, it is stated that, "[GCWW] completed designs for approximately 33.8 miles of water main replacements, representing 1.1 percent of the distribution system." This is consistent with GCWW's goal of annually replacing one percent of the distribution system. Furthermore, GCWW maintains a user-friendly website that is updated

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regularly to notify the public of projects and other current news.

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

Ohio Environmental Protection Agency
Division of Environmental and Financial Assistance
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 432016-1049

GCWW will also place the LER and FNSI on its website (<http://www.cincinnati-oh.gov/water/>) for public review.

G. Planning Information

The following agencies were provided an opportunity to comment on the proposed project:

- Ohio Historic Preservation Office
- Ohio Department of Natural Resources
- Ohio-Kentucky-Indiana Regional Council of Governments

No opposition to these projects is known at the time of the release of this document.

H. Conclusion

The proposed improvements constitute a project type (repair or upgrade of existing facilities) that qualifies for a LER. Specifically, in accordance with Ohio EPA's environmental review procedure, these projects meet the following LER criteria:

- They will have *no significant adverse environmental effect* because the proposed projects will only involve the installation of replacement water mains in previously-disturbed areas. The planning activities for the projects 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/endangered species.
- They will require *no specific impact mitigation* because the water mains will involve a relative simple installation of replacement lines within the road rights-of-way in existing developed areas, previously disturbed by the construction of roads. As such, environmental impact mitigation is not expected to be extensive or elaborate, consisting primarily of construction best management practices;

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- They will have *no adverse effect on high value environmental resources* because those resources are generally not present within the previously-disturbed and developed road rights-of-way where the replacement lines will be installed;
- They *are cost-effective* because 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 a substantial water loss;
- They are *not a controversial action* because they will not increase user charges or create significant adverse impacts, and there is no known opposition to the projects at this time;
- They 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 create a new or relocate an existing discharge to surface or ground waters, and 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* because the proposed projects merely replace water mains in existing developed areas and do not involve any wastewater treatment activities (i.e., point source discharges, volumes of pollutants, etc.), any new water supplies, or include capacity for significant expansion.

As indicated above, the proposed projects are sufficiently limited in scope and meet all applicable criteria to warrant an LER. The planning activities have identified no potentially significant adverse short-term or long-term impacts on the environment or sensitive resources including land forms, floodplains, ground water, culturally significant sites, threatened or endangered species, wetlands, aquatic and terrestrial habitat, surface water, air quality or state and federal natural areas; nor will they have secondary impacts (those related to new development served by improvements to a publicly-owned treatment works), such as the conversion of farmland to more intensive (i.e., residential/commercial) uses. They will, however, provide a safe supply of potable water for those being served by the Greater Cincinnati Water Works water system.

For further information, please contact:

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Ohio EPA, Division of Environmental and Financial Assistance
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