



June 24, 2024

Limited Environmental Review and Finding of No Significant Impact

**Board of County Commissioners of Hamilton County, Ohio – Hamilton County
Reading Road Sewer Replacement
Loan number: CS391525-0182**

The attached Limited Environmental Review (LER) is for a sanitary sewer repair and replacement project in Cincinnati which the Ohio Environmental Protection Agency intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, its costs, and expected environmental benefits. Making available this LER fulfills Ohio EPA's environmental review and public notice requirements for this loan program.

Ohio EPA analyzes environmental effects of proposed projects as part of its WPCLF program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. This project's relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment. More information can be obtained by calling or writing the person named at the end of the attached LER.

Upon issuance of this Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Reading Road Sewer Replacement

Applicant: Board of County Commissioners of Hamilton County, Ohio
138 East Court Street
Cincinnati, Ohio 45202



Figure 1. Hamilton County

Loan Number: CS391525-0182

Project Summary

The Board of County Commissioners of Hamilton County, Ohio (Board) has requested funding from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the Reading Road Sewer Replacement project. The proposed project consists of replacing and upsizing existing a sewer main along Reading Road.

History & Existing Conditions

The Board, based in Hamilton County (Figure 1) manages the Metropolitan Sewer District of Greater Cincinnati (MSDGC), also known as the Metropolitan Sewer District (MSD). MSD operates a number of different wastewater treatment plants (WWTPs) and a collection system within the City of Cincinnati and surrounding areas.

The collection system along Reading Road in Cincinnati consists of combined sewer and stormwater mains made of vitrified clay and installed prior to 1900. In October 2018, it came to MSD's attention that many of these mains were suffering from structural defects and capacity issues. During inspection, it was confirmed that many of the pipes are severely cracked and undersized. MSD began to study multiple possibilities for correcting the problem, including repairing pipes with cured-in-place pipe lining (CIPP), adding stormwater storage, pipe replacement, and point repairs. MSD ultimately chose a mix of CIPP lining, repair, replacement, and abandonment. Segments of undersized mains will be upsized to handle larger volumes of flows.

Project Description

This project will consist of two portions of work, the northern portion and southern portion. The northern portion of sewer work along Reading Road between Elsinore Place and 12th Street includes:

- 873 linear feet of CIPP lining (6-inch to 20-inch sewer)
- 910 linear feet of new 30-inch sewer
- 157 linear feet of sewer reconnections and crossings (6-inch to 24-inch sewer)
- Abandonment of approximately 1400 linear feet of existing combined sewer

The southern portion of sewer work along Reading Road between Pendleton Street and Broadway Street includes:

- 458 linear feet of new 36-inch sewer
- 34 linear feet of new 18-inch and 12-inch sewer
- Abandonment of 450 linear feet of existing sewer

See Figure 2 below for a map of the project area.



Figure 2. Map of proposed sewer repair and replacement

Implementation

The Board proposes to borrow approximately \$4 million from the Ohio WPCLF at the standard interest rate of 2.73%. WPCLF interest rates are set monthly and may change for a later loan award. Assuming a 20-year loan, borrowing this amount in WPCLF dollars could save the Board approximately \$620,000 over the life of the loan compared to the current market rate of 3.98%.

Sewer rates will not be raised to pay for this project. The average annual sewer bill for residents serviced by the Board is \$618. This is 1.37% of the median household income (MHI: \$45,235) and is higher than the Ohio average annual sewer bill, \$490. Construction began in May 2024 and will be completed in approximately 12 months.

Public Participation

This project has been discussed at Hamilton County Commissioners meetings that are open to the public from December 2020 through November 2023. In addition, MSD has mailed letters regarding the project out to affected residents from February 2020 through May 2024.

Ohio EPA is unaware of opposition to or controversy about this project. Ohio EPA will make a copy of this document available to the public on its web page: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements> and will provide it on request to interested parties.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater collection system, which involves the functional replacement of and improvements to existing sewer main. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources because no environmentally sensitive resources are likely present in the prior-disturbed road rights-of-way where the sanitary sewer will be replaced.

Is cost effective and is not a controversial action because MSD completed a comprehensive analysis in order to determine what the most cost-effective solution to the problem would be. Ohio EPA is unaware of controversy about or opposition to this project.

Does 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 this project merely replaces an existing sanitary sewer main and has no other effect on discharges. Service will not be extended in any way nor provide additional capacity.

Based upon Ohio EPA's review of the planning information and the materials presented in this Limited Environmental Review, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to the environmental features discussed previously. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts will be temporary and mitigated. This project will remove risks of public health threats from failing sewer lines.

Contact Information

Anna Collard
Ohio EPA – DEFA – OFA
PO Box 1049
Columbus, Ohio 43215

Email: Anna.Collard@epa.ohio.gov