



Mike DeWine, Governor
Jon Husted, Lt. Governor
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April 21, 2022

Limited Environmental Review and Finding of No Significant Impact

**Gallia County Rural Water Association – Gallia County
Evergreen Transmission Main Improvements
State Route 160 Transmission Main Improvements
Loan numbers: FS391410-0005, FS391410-0004**

The attached Limited Environmental Review (LER) is for two water distribution projects in Gallia County which the Ohio Environmental Protection Agency intends to finance through its Water Supply Revolving Loan Account (WSRLA) below-market interest rate revolving loan program. The LER describes the projects, their 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 WSRLA program review and approval process. We have concluded that the proposed projects should not result in significant adverse environmental impacts. These project's relatively narrow scope and lack of environmental impacts qualifies them 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 projects have changed significantly.

Sincerely,

Kathleen Courtright

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Projects: Evergreen Transmission Main Improvements
State Route 160 Transmission Main Improvements

Applicant: Gallia County Rural Water Association
542 Burnett Road
Gallipolis, Ohio 45631

Loan Numbers: FS391410-0005
FS391410-0004



Figure 1. Gallia County

Project Summary

Gallia County Rural Water (GCRW), in Gallia County (Figure 1), has requested funding from the Ohio Water Supply Revolving Loan Account (WSRLA) to fund the following two water distribution improvement projects:

- Evergreen Transmission Main Improvements, \$3,629,000
- State Route 160 Transmission Main Improvements, \$669,000

History & Existing Conditions

GCRW is a not-for-profit water association that serves most of Gallia County and has distribution mains that reach into the surrounding counties of Vinton, Jackson, Lawrence, and Meigs. GCRW operates their own water treatment facility (WTF) and provides water service to 10,000 customers through a distribution system of over 700 miles of 2-inch to 16-inch water mains, booster stations, and storage tanks. The WTF treats water supplied from ground water wells and provides iron and manganese removal and softening.

Critical portions of GCRW's distribution system have deteriorated, causing frequent breaks. Deterioration issues are compounded by the presence of undersized water mains and system pressures that are at or in exceedance of component ratings, as well as water demands that have increased since installation of original system components. If left unaddressed, these issues will continue to exacerbate the deterioration of the water mains, allowing the likelihood of further water main breaks and restricting the capability to adequately provide for the increased demand.

- **Evergreen transmission main:** This critical section of water main transfers water between two GCRW water storage tanks, from the Roach Tank to the Evergreen Tank, and ultimately provides roughly 50 percent of the total daily flow to GCRW customers. This section of main serves part or all of Greenfield, Huntington, Morgan, Raccoon, Springfield, Green, Perry, Walnut, and Harrison townships in Gallia County, as well as some customers in Lawrence, Jackson, and Vinton counties.

- **State Route (SR) 160 transmission main:** This section of water main is a subpart of the overall area served by the Evergreen transmission main. This main transfers water from the Evergreen Tank to the two SR 160 Tanks and provides over 100,000 gallons of water per day to 557 customers in the SR 160 service area.

Project Description

Improvements to the Evergreen transmission main will involve the replacement of the existing 10-inch polyvinyl chloride (PVC) main with approximately 33,000 feet of 16-inch high-density polyethylene (HDPE) main and associated appurtenances.

Improvements to the SR 160 transmission main will involve the replacement of the existing 3-inch PVC water main, as well as looping of a portion of the system along SR 850, with approximately 13,400 feet of 8-inch HPDE main and associated appurtenances. Also included in this project is the replacement of the antiquated underground SR 160 booster station with an upgraded aboveground station.

See Figure 2 for the locations of water main replacements and looping.

Existing service lines will be transferred to the new mains where they exist, and the existing water mains will be abandoned at each project's completion. Water main replacements will take place within roads, road rights-of-way (ROW), and water main easements, thereby minimizing effects on environmental resources. The contractor will be responsible for implementing standard construction best management practices to control noise, dust, and erosion, and to maintain traffic during construction.

Implementation

The cost of each project is detailed below:

- **Evergreen Transmission Main Improvements**
GCRW proposes to borrow \$3,629,000 from the Ohio WSRLA at the standard rate of 1.28 percent to fund this project. Assuming a 30-year loan award, GCRW could save approximately \$853,000 over the life of the loan compared to the current market rate of 2.58 percent.
- **State Route 160 Transmission Main Improvements**
GCRW proposes to borrow \$669,000 from the Ohio WSRLA at the standard rate of 1.28 percent to fund this project. Assuming a 30-year loan award, GCRW could save approximately \$157,000 over the life of the loan compared to the current market rate of 2.58 percent.

Interest rates are set monthly and may change for the requested May loan award.

The debt associated with these construction projects will be recovered from user charges. The average annual water bill for residents served by GCRW is \$492. This is 1.1 percent of the local median household income (MHI; \$44,858), which compares favorably to the Ohio average bill of \$697. GCRW last raised rates by three percent in 2021 and plans to implement the same rate increase in 2022 and 2023. These rate increases are not intended to cover the cost of any one specific project.

Construction for the Evergreen Transmission Main Improvements project is expected to begin following loan award and be completed by May 2023, and construction for the SR 160 Transmission Main Improvements project is expected to begin following loan award and take approximately six months to complete.

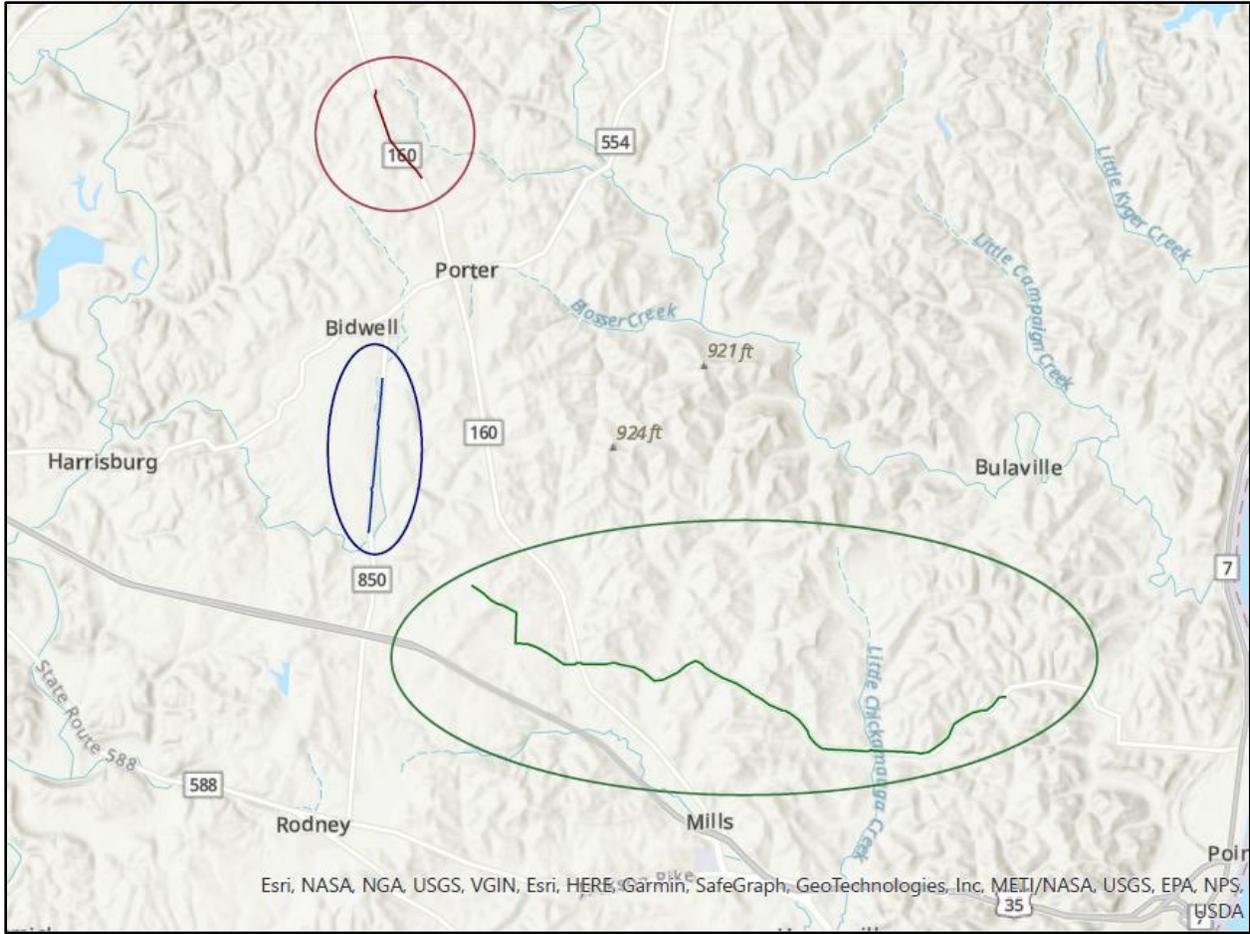


Figure 2. SR 160 transmission main replacement (red), SR 850 transmission main looping (blue), Evergreen transmission main replacement (green)

Public Participation

GCRW’s operating board reviews and provides info on customer policies at regular meetings that are open for customers to attend. An annual public meeting is held, at which GCRW provides a report on the summary of the prior year and anticipated plans. GCRW also provides information to customers through their website.

Ohio EPA is unaware of controversy about or opposition to these projects. Ohio EPA will make a copy of this document available to the public on the following webpage and will provide it upon request: <https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>.

Conclusion

The proposed projects meet the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing water distribution system, which involves the replacement and looping of existing water mains and associated appurtenances. Furthermore, the projects meet the other qualifying criteria for an LER; specifically, the proposed projects:

Will have no significant environmental effect, will have no effect on high-value environmental resources, and will require no specific impact mitigation. Water main replacements will take place within roads, road ROW, and water main easements where ground disturbances have previously taken place and in areas that lack typical habitat for state and federally listed endangered and threatened species. Directional boring will be used to avoid construction activities in perennial waterways. Portions of the Evergreen transmission main route cross designated 100-year floodplain zones and floodways. Construction within these zones will involve replacement of water mains and will not include construction of above ground structures. There will be no change in surface contours, and all disturbed areas will be returned to preconstruction conditions. For these reasons, there are no significant short-term or long-term impacts to designated floodplain zones expected due to this project. GCRW is required to coordinate with the local floodplain administrator regarding these projects. There are no historical properties or previously recorded archaeological sites within the project area, and it is unlikely that these projects will impact intact archaeological resources since construction will take place in previously disturbed areas. The contractor will be responsible for implementing standard construction best management practices to control noise, dust, and erosion, and to maintain traffic during construction.

The Ohio State Historic Preservation Office concurred with Ohio EPA's conclusion that the proposed construction is unlikely to impact important historical and archaeological resources.

The Ohio Department of Natural Resources and United States Fish and Wildlife Service concurred with Ohio EPA's conclusion that the proposed construction is unlikely to impact state and federally listed endangered and threatened species and critical habitat.

Is cost effective. Due to the critical function of the water mains being addressed by these projects, a "do nothing" alternative is not viable. Since this project addresses issues regarding undersized and over-pressurized water mains, the only viable alternative to correct these issues is to replace the existing mains with larger, adequately sized mains. Doing so will improve the efficiency and reliability of these portions of the distribution system and will have the added benefit of reducing maintenance costs necessary to continue repairing water main breaks.

Is not a controversial action. As mentioned previously, the anticipated rate increases are not intended to cover the cost of any one specific project, and user rates will still compare favorably to the Ohio average upon completion of this project.

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, will not significantly increase the amount of water withdrawn from an existing water source, and will not substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters. This project merely involves the replacement of water mains within the existing service area and will not otherwise alter GCRW's distribution system (withdrawal, treatment, distribution, usage, etc.).

Will not provide capacity to serve a population substantially greater than the existing population. The increases in water main sizes included in these projects are intended to correct issues related to the undersized and over-pressurized mains that are present within the distribution system, as well as adequately and reliably meet the present water demands. It is not the intent to increase service capacity, and there will be no change to the system's treatment and storage capacities; thus,

completion of this project will not provide capacity to serve a population substantially greater than the existing population.

To conclude, GCRW's proposed projects are sufficiently limited in scope and meet all applicable criteria to warrant an LER. The planning review of both projects identified no potentially significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources (surface waters, coastal zones, floodplains, wetlands, state-designated scenic and recreational rivers, prime and unique agricultural lands, aquifer recharge zones, archaeological and historically significant sites, threatened and endangered species, and state and federal wildlife areas). Rather, completion of these projects will alleviate water main breaks and improve the operational efficiency and reliability of critical portions of GCRW's distribution system.

Contact information

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