



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

**December 19, 2022**

**Limited Environmental Review and Finding of No Significant Impact**

**City of Wilmington – Clinton County  
Raw Water Main Relocation  
Loan number: FS391003-0018**

The attached Limited Environmental Review (LER) is for a raw water main relocation project in Wilmington 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 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 WSRLA 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 cursive script that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Project: Raw Water Main Relocation

Applicant: City of Wilmington  
69 North South Street  
Wilmington, Ohio 45177

Loan Number: FS391003-0018

### **Project Summary**

The City of Wilmington in Clinton County has requested \$880,934 from the Ohio Water Supply Revolving Loan Account (WSRLA) to move a watermain underneath State Route 73 to accommodate an Ohio Department of Transportation (ODOT) road widening project.

### **History & Existing Conditions**

The City of Wilmington is located in Clinton County, in southwest Ohio (Figure 1). The city sources its water from Caesar Creek Lake and city-owned reservoirs in Burtonville, south of Wilmington. Their water treatment plant (WTP) is rated to produce four million gallons per day (MGD) of treated surface water, which is distributed through water lines, and to four water storage towers. Wilmington distributes an average of 1.8 MGD among 5,109 service connections and to a population of 12,392 people.

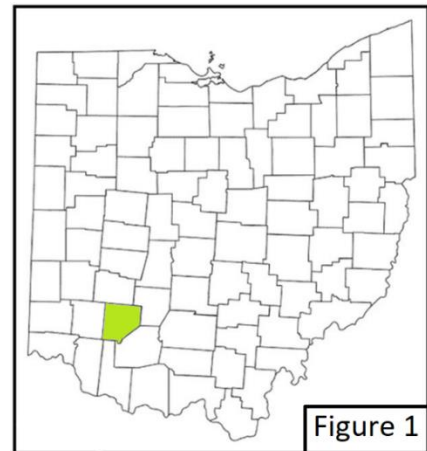


Figure 1

Caesar Creek Lake is about 13 miles west of Wilmington. A 24-inch water main, built in 1993, conveys water to the city, mostly along the right-of-way of State Route 73. Due to a high number of accidents, ODOT is planning to add left-turn lanes on SR 73 at the intersection of SR 380. The widened roadway will conflict with the current path of the raw water main, presenting problems both during and after the construction project.

ODOT proceeded with project design and determined that excavation during construction will involve digging to within inches of the water main, then building layers of new roadway/base directly over the main. ODOT, while strongly recommending the relocation of the main, communicated in May 2022 that the city would be responsible for the repair of any main breaks during construction, including payments to the ODOT contractor for delays caused by water main repairs.

Wilmington ultimately determined the cost of moving the water main would be greater or at least equal to the risk of letting ODOT build the road over the main. The city agreed with ODOT that if it isn't moved, the main will probably break multiple times during construction, plus after construction

there would be a compromised main under a new roadway. Future main breaks would require extensive roadway reconstruction and complicated traffic control.

### **Project Description**

ODOT will be widening State Route 73 near where Interstate 71 intersects it and adding a turn lane near SR 380. Since the ODOT project will involve excavation to within one foot of the existing water main the City of Wilmington intends to avoid compromising the water main due to construction by relocating 2,200 feet of 24-inch water main from underneath State Route 73 to the right-of-way next to the road, with the same size water main. A parallel 8-inch line belonging to Western Water Company is also being moved to the right-of-way as part of the ODOT project. The newly located segment of water main will be easier to access for maintenance, and will avoid the stress of heavy traffic under a state route. No trees will need to be removed for this project.



**Figure 2. Map of project area on State Route 73**

### **Implementation**

Wilmington will borrow \$880,934 from the WSRLA for the water main relocation project at the standard community interest rate, currently at 3.16%. During the 30-year loan period, Wilmington

will save approximately \$236,000 using WSRLA financing, compared to the market rate of 4.46%. Interest rates are set monthly and may change for the month of loan award.

The road widening project is funded by ODOT.

A typical Wilmington residential water customer pays \$39.98 per month. The last water rate increase was 5% in January 2022 and rates will increase by 3% in each of the next two years. According to the 2014-2018 American Community Survey, the estimated median household income (MHI) for a resident of Wilmington is \$35,833. The average water utility bill amounts to \$453/year, which is 1.3% of the MHI and compares favorably to the Ohio average water bill of \$639.

Anticipating loan award in January 2023, construction work will be completed by the end of 2023.

### **Public Participation**

The relocation of the raw water main was discussed at several regularly scheduled city council meetings between November 2021 and June 2022. In addition, legislation for the application of the WSRLA funding was considered and approved in public city council meetings.

Ohio EPA is unaware of any public controversy or opposition to this project, and will make a copy of this document available to the public on its web page at <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements>. Information supporting the LER is available from the project contact named below.

### **Conclusion**

The proposed water main project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing water distribution system, which involves the functional replacement of and improvements to an existing water 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 has no effect on high-value environmental resources.** Construction for the water main replacement will be in the street right-of-way and under the roadway, in a developed area that lacks ecologically valuable environmental resources or habitat. No trees will be cut down to replace the water main. Standard construction best management practices will minimize noise and dust, and traffic disruptions will be temporary with appropriate traffic maintenance measures present.

**Is cost-effective and is not a controversial action.** This project will not specifically increase residential water rates. Relocating this water main will prevent breaks to the water main from the road widening construction, and greatly simplify maintenance by moving the water main to the right-of-way from under the road. Ohio EPA is unaware of controversy or opposition to the project.

**Does not create a new, or relocate an existing discharge to surface or ground waters, and 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, or substantially increase the volume of discharge or 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.** This project will only be replacing an existing

water main to eliminate a threat to public health. There are no changes to water treatment, sources, or discharge.

**Contact information**

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