



April 30, 2024

Limited Environmental Review and Finding of No Significant Impact

**City of Germantown – Montgomery County
Fire Hydrant and Valve Replacement, Phase 1
Loan number: FS390387-0004**

The attached Limited Environmental Review (LER) is for a fire hydrant and valve replacement project in Germantown 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 black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Fire Hydrant and Valve Replacement, Phase 1

Applicant: City of Germantown
One North Plum Street
Germantown, Ohio 45327

Loan Number: FS390387-0004

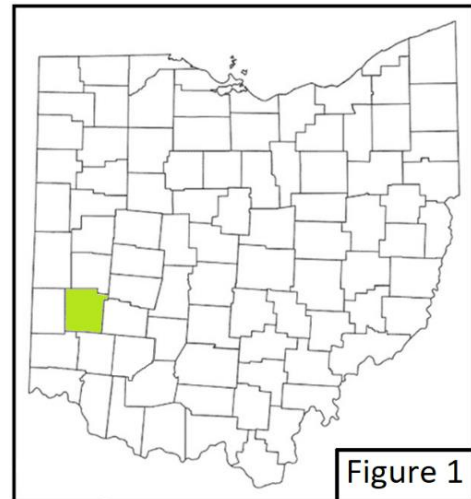
Project Summary

The City of Germantown has applied for a Water Supply Revolving Loan Account (WSRLA) loan for the replacement of old and failing fire hydrants. Germantown requested \$536,633 to pay for the improvements. Construction will be along local streets and tree lawn strips.

History & Existing Conditions

The City of Germantown is located in southwestern Montgomery County (see Figure 1). According to the 2017-2021 American Community Survey, the population of Germantown is 5,748. Germantown sources water from the Buried Miami Valley Aquifer by four wells located in Kercher Park on the south side of Germantown. The city's water treatment plant has a capacity of 1.728 million gallons per day (MGD) and is sufficient for current and future demand.

The City of Germantown completed an inspection of the city fire hydrants in 2021 and found 24 hydrants that have been inoperable for two years or longer. The fire hydrants are at least 49 years old, with many as old as 98 years old. The associated water valves and watch valves are aging, and are unreliable when they need to be operated. The current hydrant situation potentially leaves the city without sufficient water pressure during a fire situation.



In addition to many of the aging fire hydrants not being operable; the original fire hydrants installed in 1923 have solid barrels which do not break away if an automotive collision were to happen. This type of accident results in more significant injuries to the vehicle, driver and passengers. In addition to the personal injuries experienced by the collision, there will be significant water loss to the water system. This style of fire hydrant does not meet current City of Germantown fire hydrant specifications and are beyond their useful life.

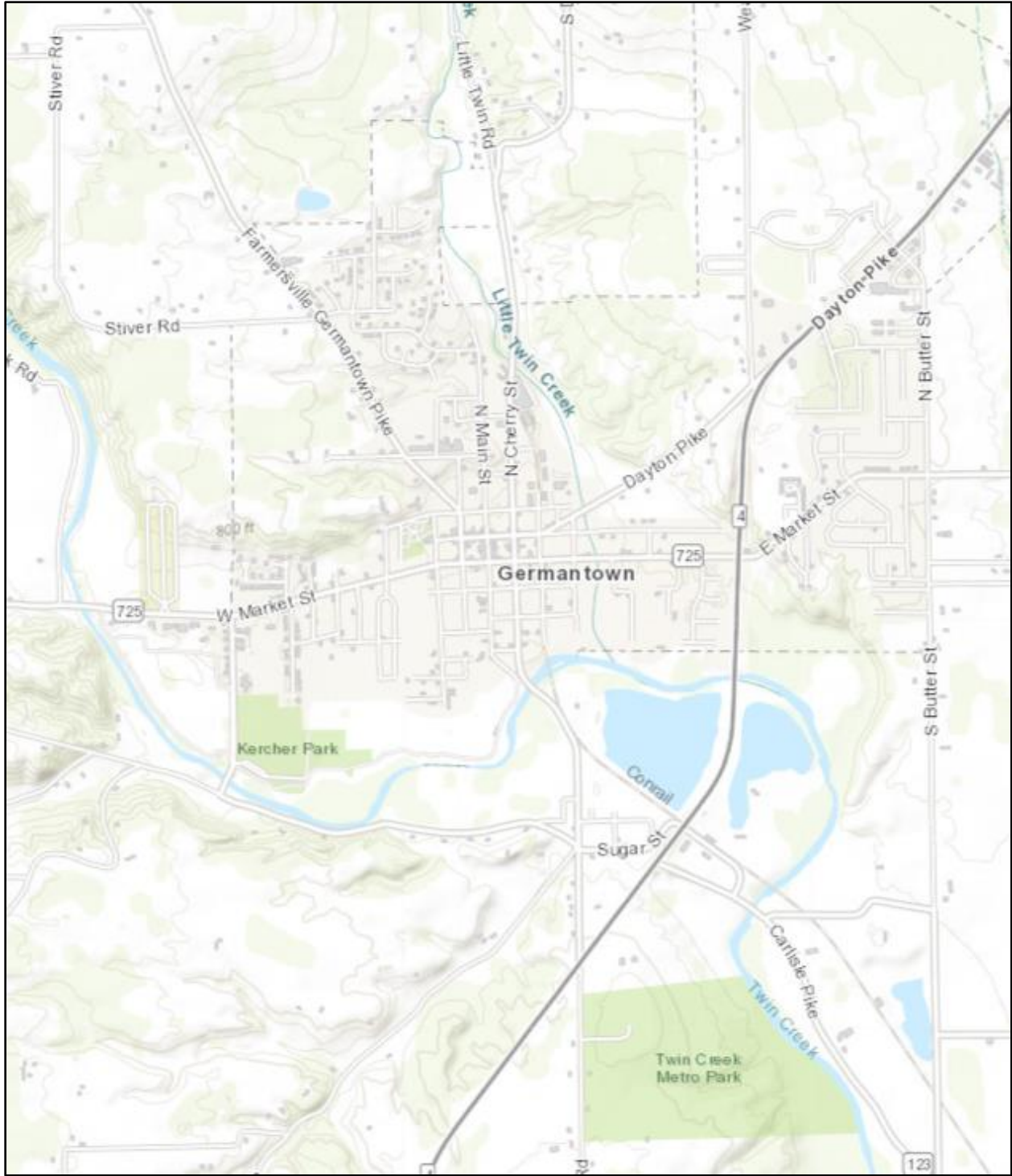


Figure 2. Map of Germantown

Project Description

The project includes replacement of 24 fire hydrants and the associated valves along McClure Street, North Plum Street, Arnold Avenue, Peffley Street, Comstock Street, North Main Street, Montgomery Avenue, West Warren Street, North Maple Street, North Walnut Street, West Market Street, South Walnut Street, East Gunckel Street, South Mulberry Street, Jefferson Street, East Center Street, Coleman Avenue, Virginia Avenue, Baltimore Street, Pennsylvania Street, Dayton Germantown Pike, Mark Court, Gibraltar Drive, Lisa Drive, North Butter Street, South Butter Street, Pagett Drive, Rogers Road, North Hillcrest Drive, and Bradley Drive. The hydrants are located along city streets and have a small disturbance footprint. Germantown has a plan to manage traffic during construction, and the sites will be restored to pre-construction condition after construction is complete.

Implementation

Germantown will borrow \$536,633 from the WSRLA at the small-community interest rate of 2.26%. During the 30-year loan period, Germantown will save approximately \$193,000 by using WSRLA dollars at this rate, compared to the market rate of 4.06%. Please note that WSRLA interest rates are set monthly and subject to change depending on loan award month.

A typical residential water customer in Germantown currently pays \$26.15 per month for water. The last water rate increase was 6% in April 2023, and annual rate increases of 6% are planned for 2024 and 2025. According to the 2018-2021 American Community Survey, the estimated median household income (MHI) for a resident of Germantown is \$77,452. The average yearly water utility bill will amount to \$373.70 by 2025, which is 0.48% of the MHI and compares favorably to the Ohio annual average bill of \$639.

Anticipating loan award in April 2024, proposed changes will be complete by early 2025.

Public Participation

The project was discussed at public city council meetings in March and April of 2024. The project was also featured on the city's website on January 25, 2024, where the improvements are described. Water rates are not impacted by the project.

Ohio EPA is unaware of any opposition to this project, and 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 distribute it to interested parties. Information supporting the Limited Environmental Review is available from the project contact named below.

Conclusion

The proposed 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 existing mechanical equipment. 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 the construction will take

place on city streets and tree lawn, areas that have already been developed and do not contain these resources. No trees will be cut down for the project.

Is cost effective and not a controversial action. With the age of the hydrants, and lack of functionality, it is a more long-term, cost-effective solution to replace them than to repair them. Germantown has made a good effort to make its residents aware of the project and other water system improvements projects. Ohio EPA is not aware of any opposition to 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, 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 because the project will only be replacing existing fire hydrants and valves. Water withdrawals will not change, discharges will not change, and no new service lines will be connected to the system as a result of this project.

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 result in functional fire hydrants and valves.

Contact Information

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