



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

June 18, 2018
Limited Environmental Review and Finding of No Significant Impact
City of Columbus – 2018 Enhanced Metering (AMI) System and Installation,
CIP 690358-100000
Franklin County
WSRLA No. FS390274-0313

The attached Limited Environmental Review (LER) is for a water meter replacement project in your area 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 document.

Loan award will 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 blue ink that reads "Jerry Rouch". The signature is written in a cursive, flowing style.

Jerry Rouch, Assistant Chief
Division of Environmental and Financial Assistance
Office of Financial Assistance

JR/JS

attachment

LIMITED ENVIRONMENTAL REVIEW

A. PROJECT IDENTIFICATION

Project Name:	Columbus – 2018 Enhanced Metering (AMI) System & Installation, CIP 690358-100000 and subsequent annual project phases
WSRLA No.:	FS390274-0313
Project Contact	Tracie Davies, Director Columbus Department of Public Utilities 910 Dublin Road Columbus, OH 43215

B. HISTORY and EXISTING CONDITIONS

The City of Columbus, in Franklin County, owns and operates three water treatment plants and a water distribution system that provides potable drinking water to approximately 1.2 million people. More than 300,000 meters (see Figure 1) measure water use and are the basis for billing customers.

Currently, water meters provide usage data from the water meter itself (typically inside a structure) to a numerical remote device on the outside of the structure. The numbers on this remote device are manually read by meter readers and are stored in a handheld digital device. Typically, meter readers must read each residential property quarterly and each commercial property monthly to avoid estimated billing. This data is downloaded daily into processing software and is then available in the Customer Information System (CIS), to allow billing, customer service and other functions.

The City of Columbus has requested assistance from the Ohio Water Supply Revolving Loan Account (WSRLA) to finance needed improvements to ensure future reliability and effective operation. Over five years, the WSRLA will finance approximately \$85 million in loan allocations of approximately \$15 million per year, to replace or convert all water meters in the Columbus distribution system. Local funds will cover any additional project costs.

C. PROJECT DESCRIPTION

The City of Columbus proposes replacement or conversion of approximately 300,000 meters with digital water meters and electronic transmitters over the next five years. Each installation will include a fixed-base wireless system to instantaneously on a real-time basis automatically transmit all meter data to a central location where the CIS resides. This will require installation of wireless/radio transmitting infrastructure throughout the service area, including transmitters, repeater stations, wiring, etc., to allow the information to be transmitted into the City's fiber network and ultimately conveyed back to the CIS for processing and analysis.

Some of the goals of the proposed project are:

- Revenue protection
 - Monthly billing; quick detection of meter issues or tampering; reduction of water theft
- Enhanced customer service
 - Reduction of high bill complaints; online alerts; access to consumption history
- Operational efficiency
 - Reduction of meter reading costs, field work and meter testing; improved distribution system performance
- Environmental benefits
 - Reduction of vehicles on the road, leakage and water loss; promotes conservation

All work will be within existing structures, developed areas lacking important environmental features, and involves detaching each existing meter from building plumbing and attaching a new meter.

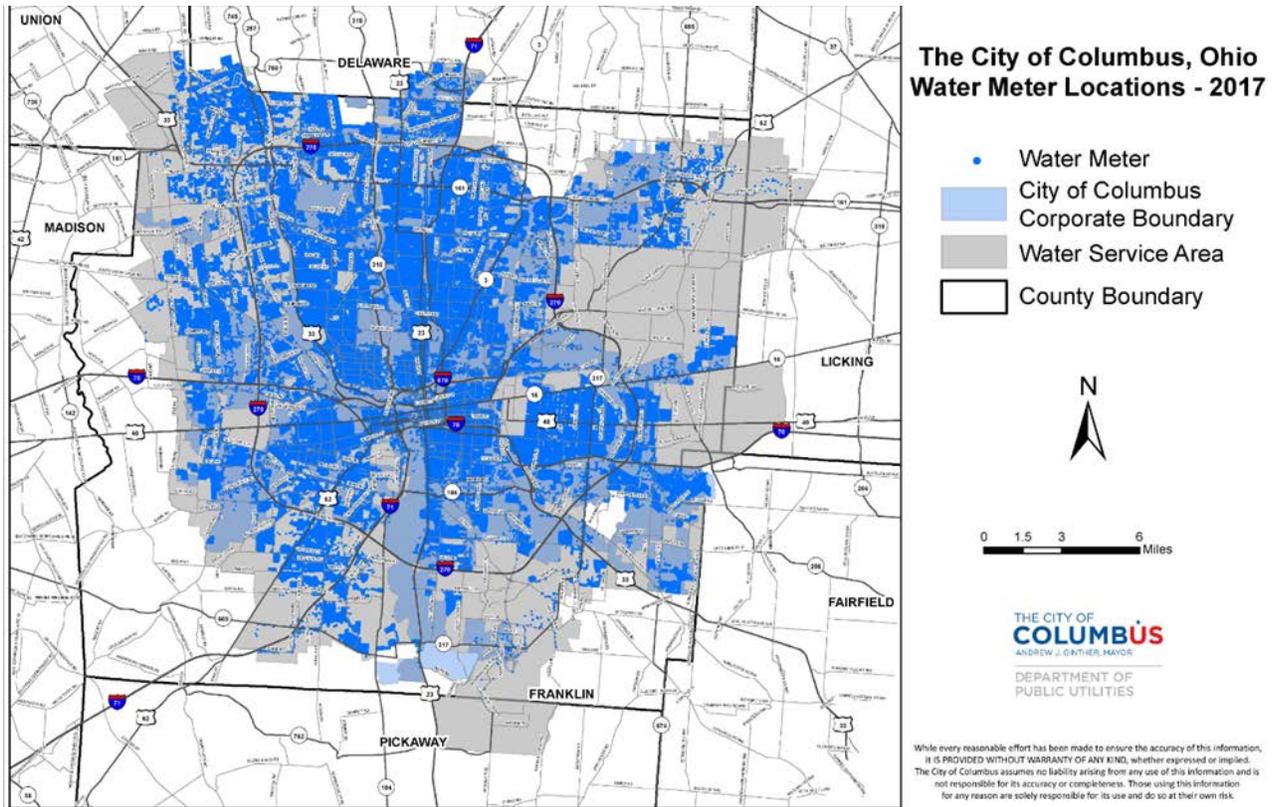


Figure 1. Project area.

D. ESTIMATED PROJECT COSTS

For this phase of the project, the City of Columbus plans to borrow approximately \$15 million from the WSRLA at the Standard interest rate (now 2.15%; the rate is set monthly and may change for a later loan award). During the 20-year loan period, the City of Columbus will save approximately \$3.75 million by using WSRLA dollars at this rate, compared to the market rate of 3.40%.

For the entire five-year project, the City of Columbus plans to borrow approximately \$85 million from the WSRLA at the Standard interest rate. Using the same scenario as above, understanding that the rate is set monthly and may change for later loan awards, during a 20-year loan period, the City of Columbus would save approximately \$21.25 million overall by using the WSRLA for this project.

E. PROJECT SCHEDULE

The anticipated loan award will occur in September 2018. The project is expected to begin immediately afterward, with the work being completed within one year and followed by the next phase until full completion approximately four to five years later.

F. PUBLIC NOTIFICATION

The City of Columbus Department of Public Utilities is creating a public outreach program for this project since all ratepayers will be required to participate. The project is included in the city's capital improvement plan (CIP), CIP No. 690358-100000, which is accessible to the public.

Project information will be communicated to the public, political leaders and other stakeholders; a consultant will be hired to assist with a local communication strategy. This will include, but is not limited to, branding of the program; developing a communications plan to inform all stakeholders; developing key messages and visual identifiers; and, developing brochures, direct mail and digital communication.

Prior to construction, the city's Neighborhood Liaison will be contacted and informed of the project. Further community outreach may result through the Neighborhood Liaison Program. Notification letters will also be mailed out in advance to affected residents and property owners. These letters will provide details of the project and contact information. Based on the limited environmental and economic impacts, this is considered an appropriate level of public participation.

Ohio EPA will make a copy of this document available to the public on its web page: <http://epa.ohio.gov/defa/ofa.aspx> ("WSRLA Documents for Review and Comment") and will provide it upon request to interested parties. Information supporting this Limited Environmental Review (LER) is available from the project contact named below.

G. PLANNING INFORMATION

The proposed project was reviewed by the Ohio EPA Division of Drinking and Ground Waters and Division of Environmental and Financial Assistance. No review agency opposes the project.

H. CONCLUSION

The proposed water meter replacement project is a functional replacement of existing mechanical equipment in an existing public water system that qualifies for an LER and meets the following additional LER criteria:

It has no significant environmental effect, no effect on high value environmental resources, and does not require extensive specific impact mitigation. The project replaces water meters within existing structures (i.e., homes, businesses), areas lacking important environmental features. There is no ground disturbance involved and no environmental impacts are created.

It is cost effective and not controversial. User rates will be adjusted to accommodate the project. However, due to operational savings and the additional revenue expected from replacement of underperforming existing meters, it is anticipated that the project will have a payback period estimated at 7.1 years. A typical Columbus household's average annual water bill is approximately \$440 which is 0.96% of local median household income (MHI = \$45,659). These numbers compare favorably to the Ohio average water bill of \$628 and 1.2% of Ohio MHI. Water bills below 1.8% of MHI are considered affordable. Ohio EPA is unaware of controversy about or opposition to this project.

This project does not create a new, or relocate an existing, discharge to surface or ground waters; will 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; 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. This project involves replacement of water meters and does not otherwise alter Columbus's public water system (withdrawal, treatment, distribution or usage of potable water).

The planning activities for the project have identified no potentially significant adverse impacts. The project is expected to have no 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 or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, threatened or endangered species, or state and federal wildlife areas).

The project will allow more accurate and efficient billing and will ensure proper operation of the distribution system, helping Columbus to improve the overall reliability of its public drinking water system.

I. CONTACT PERSON

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