NOVEMBER 10, 2010

FINDING OF NO SIGNIFICANT IMPACT
TO ALL INTERESTED CITIZENS, ORGANIZATIONS,
AND GOVERNMENT AGENCIES

VILLAGE OF WEST MILTON, WEST MILTON LOW-HEAD DAM REMOVAL AND
STILLWATER RIVER RESTORATION PROJECT
MIAMI COUNTY
WPCLF LOAN # WR390985-0002

The purpose of this notice is to seek public input and comments on Ohio EPA's preliminary decision that a Supplemental Environmental Study is not required to implement the recommendations discussed in the attached Environmental Assessment of a project plan submitted by the entity mentioned above for its Water Resource Restoration Sponsor Program project.

How were environmental issues considered?

The Water Pollution Control Loan Fund program requires the inclusion of environmental factors in the decision-making process. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed alternatives in its review and approval process. Environmental information was developed as part of the project plan, as well as through the project plan review process and during site inspections. The Agency's preliminary Environmental Assessment found that the project does not require the preparation of a Supplemental Environmental Study.

Why is a Supplemental Environmental Study not required?

Our environmental review concluded that significant environmental impacts will not result from the action. Any adverse impacts have either been eliminated by changes in the project plan or have been reduced by the implementation of the mitigative measures discussed in the attached Assessment.
How do I get more information?

A map depicting the location of the project is included as part of the Environmental Assessment. The Environmental Assessment presents additional information on the project, alternatives that were considered, impacts of the action and the basis for our decision. Further information can be obtained by calling or writing the contact person listed in the back of the Environmental Assessment.

How do I submit comments?

Any comments supporting or disagreeing with this preliminary decision should be submitted to me at the letterhead address. We will not take any action on this general plan for 30 calendar days from the date of this notice in order to receive and consider any comments.

What happens next?

In the absence of substantive comments during this period, our preliminary decision will become final. The entity will then be eligible to receive loan assistance from this agency.

Please bring any information that you feel should be considered to our attention. We appreciate your interest in the environmental review process.

Sincerely,

[Signature]

Gregory H. Smith, Chief
Division of Environmental & Financial Assistance

Attachment
ENVIRONMENTAL ASSESSMENT

A. Project Identification

Name: West Milton Low-Head Dam Removal and Stillwater River Restoration Project

Address: Mr. Tony Howard, Village Administrator
Village of West Milton
701 South Miami Street
West Milton, OH 45383

WPCLF #: WR390985-0002

B. Project Summary

The Metropolitan Sewer District (MSD) of Greater Cincinnati is proposing to sponsor a dam removal project on the Stillwater River in West Milton to remove barriers for aquatic organisms, improve aquatic habitat conditions, and reduce the amount of sediment in the currently impounded section of the river. As a result, the recreational uses of the river will change and new opportunities will be made available to the public. This proposed project is partly in response to liability concerns expressed by the village about the continued presence of the dam, as well as to help address the diminished biological integrity of the Stillwater River in the impounded section, when compared to the free-flowing sections of that stream. West Milton, along with the Ohio River Foundation and Stantec Consulting Services, will administer this proposed project. The originally estimated cost of the proposed dam removal project and related in-stream and river bank restoration activities was $1,391,000, with all but $10,000 to be provided by Ohio EPA’s Water Resource Restoration Sponsor Program (WRRSP). Of this originally nominated amount, $50,000 for educational and outreach activities was ruled ineligible, reducing the total eligible estimated project cost to $1,331,000.

Readers should note that MSD has requested $6,442,973 from the Ohio Water Pollution Control Loan Fund (WPCLF) to address home sewage treatment system (HSTS) and existing wastewater infrastructure problems within the Dry Run sub-basin in Anderson Township, Hamilton County, Ohio, and also provide enough flow capacity to enable the area to reach its projected build-out population. By applying for WPCLF funding of the Dry Run project and concurrently participating in the related WRRSP through a request for additional funds for the West Milton dam removal project, MSD will receive a WPCLF interest rate reduction of 0.1% and an amount of money equal to the interest that otherwise would be charged to the wastewater loan to pay for the WRRSP project.
MSD’s loan will provide $1,331,000 toward the total restoration project cost of approximately $1,381,000. Additional funding from the United State Fish and Wildlife Service’s Natural Fish Habitat Grant program ($10,000) completes the financing package. Readers should note that any project cost increases above $1,331,000 will have to be financed by the village or other sources, as the WRRSP is limited to funding the originally approved eligible amount. A separate Environmental Assessment that details MSD’s Dry Run project is available from the contact named at the end of this document.

C. Existing Conditions in the West Milton/Stillwater River Project Area

The Stillwater River is a generally free-flowing tributary of the Great Miami River, from its headwaters in Darke County to its confluence with the Great Miami in Montgomery County. The 673 square mile watershed with its 280 miles of streams is dominated by rural land uses. Cropland, pasture, and woodland occupy about 80 to 90% of the land area in the watershed. For this reason, the Stillwater River watershed historically has been impacted by agricultural nonpoint source runoff, as well as by flow regime and habitat alterations. Despite these influences on water quality, large sections of the Stillwater River are valued for their exceptional warmwater habitat conditions and state scenic river designation (roughly forty-five miles).

Of the Stillwater River’s total length, about 12 miles currently show signs of impacts from low-head dams, or previous channelization and hydromodification related to agricultural activities. Near West Milton, the 13 foot tall and 305 foot long low-head dam on the Stillwater River impounds roughly two miles of river and is the last obstruction to the movement of aquatic organisms before the Englewood flood control structure at U.S. Route 40. Figure 1 on the following page shows the location of the existing dam at West Milton.

The Stillwater River Watershed Action Plan was last updated in 2006 by the Stillwater Watershed Joint Board and formally endorsed by the State of Ohio in 2006. Two Total Maximum Daily Load (TMDL) studies were completed by Ohio EPA (in 2004 and 2009) and subsequently approved by US EPA. Together these reports describe the condition of the Stillwater River and its watershed and recommend actions to restore the river to its potential biological and hydraulic integrity.

Ohio EPA’s water quality surveys conducted over the past ten years and culminating in the 2009 TMDL study have found that agricultural activities (e.g., channelization, hydromodification, and confined animal feeding operations) are a primary source of impairment of the Stillwater River between its headwaters and the confluence of Greenville Creek with the main stem. Below the agriculturally impaired segments, development related impairments appear to be having more of an effect on water quality than are other sources of impairment. To summarize, Ohio EPA has concluded that nutrient enrichment, sedimentation,
and stream habitat degradation are the main causes of water quality impairment in the Stillwater River, and thus habitat improvements and pollutant load reductions together are needed to bring about the restoration of water quality.

Figure 1, Stillwater Dam Project Location, Not to Scale Shown

Readers interested in more specific details about how to achieve these outcomes should refer to Pages 82 – 90 of the 2009 TMDL report available on-line at http://www.epa.state.oh.us/portals/35/tmdl/StillwaterTMDL_final_aug09.pdf. As part of this overall documentation, readers should note that habitat restoration through dam removal can improve both water chemistry and biological integrity significantly and can result in attainment of a river’s aquatic life use designation if other impairments are insignificant, or reduced or eliminated.

D. Project Planning

As noted in the previous section, Ohio EPA has completed a number of studies and reports of the Stillwater River during the past ten to fifteen years. These
reports date back to the State of Ohio’s 1990 Nonpoint Source Assessment and a locally prepared nonpoint source management plan that set the stage for implementing the Stillwater Watershed’s Joint Board of Supervisors’ Watershed Protection Project. Since 1995, federal and state funds have focused on this watershed in an effort to bring about lasting improvements in water quality through implementing the proposals included in the watershed planning documents. In that regard, the current proposal outlined in the Village of West Milton’s Low-Head Dam Removal and Stillwater River Restoration Project planning document (also referred to as the WRRSP implementation plan) is a continuation of the ideas first developed in the 1990s.

E. Discussion of Feasible Alternatives

In the project plan developed by West Milton, the Ohio River Foundation, and its engineering consultant, several feasible alternatives were compared. These options are summarized below and generally share, to one degree or another, the objective of restoring the structural (e.g., depth and velocity) and functional (e.g., sediment transport and nutrient cycling) elements of the Stillwater River ecosystem that favor well-balanced aquatic communities. It is also the objective of this project to address water quality impairments caused by oxygen demanding sediment within the impoundment. More specifically, Ohio EPA expects that the alternative selected from the following options will restore the biological integrity of a two-mile section of the Stillwater River near West Milton (roughly between River Mile [RM] 20 and 18).

Option 1 – No Action.

According to the village’s project planning document, a no-action alternative would not comply with ambient water quality standards and would not produce a well-balanced warmwater aquatic community. Under this option, the Stillwater River would likely remain on the Clean Water Act Section 303(d) list of degraded water bodies requiring a TMDL study and implementation. In addition, the continued degradation of the West Milton Dam would eventually lead to failure, potentially jeopardizing human life, damaging infrastructure downstream, and substantially degrading aquatic communities downstream of the dam. The exceptional warmwater habitat characteristics of the rest of the Stillwater River would continue to be unmet in the dam pool.

Option 2 - Provide Fish Passage in the Former Tailrace.

As explained in West Milton’s project planning document, this alternative would involve demolishing the legacy hydro-electric facility and retrofitting the abandoned tailrace to accommodate fish passage. This option would likely include importing large quantities of gravel and cobble to make the tailrace passable. While this alternative would provide for improved aquatic species migration, including both fish and fresh water bivalves, it would not bring the
impoundment upstream of the dam into use attainment and the impounded area would remain on the 303(d) or TMDL list of degraded water bodies in Ohio. Readers should note that this proposal is not in the Watershed Action Plan for the Stillwater River and its lack of consistency is a potential concern from a non-monetary (implementability) perspective. Estimated Project Cost = $850,000.

Option 3 - Lower the Pool Elevation.

As described in the village’s planning document, the impounded pool elevation may be lowered by removing a portion of the interior section of the West Milton Dam. Conceptually this would achieve many of Ohio EPA’s water quality use attainment goals by restoring free flowing habitat to approximately half of the upstream areas/river length currently backwatered. However, because of the poor structural condition of West Milton Dam, this alternative may not be feasible. Further, aquatic life use attainment objectives would not be achieved in areas immediately upstream of the impoundment. The dam would also still be a barrier to aquatic species. Again, readers should note that this proposal is not in the Stillwater River Watershed Action Plan and its lack of consistency is also a potential concern from a non-monetary (implementability) perspective. Estimated Project Cost = $960,000.

Option 4 - Remove the Dam

As indicated in West Milton’s plan, the dam would be deconstructed in sections starting on the east side of the river and moving west. The east dam abutment would likely remain in place (underground). The remnants of the hydro-electric facility would also be demolished. Clean debris from the demolished dam could be used to stabilize the Stillwater River bed and banks following de-construction. Material unsuitable to remain on site would either be hauled off-site, or buried in the abandoned tail race downstream of the dam. Depending on the outcome of the proposed sediment study, a large volume of sediment may pose a risk to the downstream portion of the Stillwater River if it is released following the dam removal. Therefore, a preliminary recommendation is to hydraulically dredge sediment from the impoundment for possible placement in the abandoned tail race. Other possible work includes the demolition of retaining walls adjacent to the river and riverbed, and bank stabilization. The debris from the dam deconstruction, hydro-facility demolition, and wall removal will be hauled off site. Estimated Project Cost = $1,381,000. Despite the higher cost of this option when compared to the other three alternatives, it is closest in scope and intent to the proposal in the Watershed Action Plan. Also, readers should note that the WRRSP share of this current total project cost estimate is limited to $1,331,000.

F. Selected Alternative

Under Ohio EPA’s program requirements for nonpoint source projects such as this proposed project, the selected alternative’s costs must be reasonable. Based on the information summarized in the previous section and included in the
The Village of West Milton’s selected alternative for this proposed project will entail completely removing a low-head dam on the Stillwater River near River Mile 18. Readers should note that the dam is approximately 13 feet tall and 305 feet long. According to the village’s WRRSP implementation plan, the dam was probably constructed in 1918 as a hydro-electric facility by the Miami Conservancy District and was formerly known as the L.A. Pearson Electric Power Plant (for more information on the historical significance of the dam and related structures, please see the Environmental Impacts section of this document below). Currently, the dam impounds approximately 11,600 feet of the Stillwater River upstream of the dam, causing habitat and sedimentation impairments. Its removal will allow aquatic organisms to move freely within this two-mile section of the river, decrease the amount of sediment built-up in the impounded area, increase the quality of aquatic habitat, and restore the West Milton area for recreational use. As noted in the village’s project plan, removal of the dam will be followed by restoring the banks of the Stillwater River with native vegetation and enhancing the river bed with natural channel substrates.

In addition to these activities and outcomes, the village’s WRRSP implementation plan provides greater specifics on the dam removal process as follows (see pp.1-2 of the plan):

“The dam will be de-constructed in sections starting on the east side of the river and moving west. The east dam abutment will likely remain in place (underground). The remnants of the hydro-electric facility will also be demolished. Preliminary review of the site has not indicated the presence of hazardous or toxic materials. Therefore, no off-site disposal of such material is expected at this time. Clean debris from the demolished dam (i.e. gravel, boulders, cobbles, select clean concrete) may be used to stabilize the Stillwater River bed and banks following deconstruction. Material unsuitable to remain in the river (i.e. concrete, bricks, other clean fill) will likely be placed and buried in the abandoned tail race and material unsuitable to remain on site (i.e. steel bars, metal grates, pipes, etc.) will likely be hauled to a construction demolition disposal facility in either Miami or Montgomery County.”

“It is unclear at this time if a significant fine sediment wedge exists upstream of the dam. A large volume of sediment may pose a risk to the downstream portion of the Stillwater River, due to aggradation, if it is released following the dam removal. Sediment transport capacity calculations performed as part of the Englewood low-head dam removal project suggested removal of large quantities of fine sediments prior to dam removal to prevent downstream aggradation. A similar set of circumstances (i.e. slope, contributing watershed, dam size, channel size, sediment composition) is probable at the West Milton site. Therefore, the preliminary recommendation is to hydraulically dredge
approximately 10,000 cubic yards of sediment for placement in the abandoned tail race (located downstream of the dam and west of the river). ... Geomorphic observations of the downstream portion of the Stillwater River do not indicate degrading or down-cutting; thus, the river is not likely “hungry” for additional fine sediment as can be common downstream of much larger dams or impoundments.”

“Additional work items include the demolition of retaining walls adjacent to the river and river bed and bank stabilization. Some debris from the dam deconstruction, hydro-facility demolition, and wall removal will be hauled off site. An alternative disposal method is to place and bury the debris in the abandoned tail race for a cost savings of approximately $352,000. Final disposal means and methods will be determined during permitting and final design.”

To summarize, the following activities will be involved in the construction phase of this project:

- Mobilization and Demobilization
- Clearing and Grubbing
- Access Road Stabilization and Maintenance (No. 2s)
- Gate Replacement
- Temporary Construction Safety Fence
- Construction Layout Staking
- Tail Race Grading and Maintenance
- Legacy Hydro Facility Demolition
- Concrete Dam Removal
- Constructed Riffle (using select dam rubble)
- Bank Excavation and Grading
- Tree Planting (10-gallon size)
- Seed and Mulch
- Erosion Control Blankets
- Live Stakes
- Utility Relocation
- Sediment Excavation - Pump On Site
- Sediment Excavation - Haul Off Site
- Dam Haul Off Site
- Import Riffle Material
- Hydro Facility Haul Off Site
- Wall Demolition
- Haul Wall Off Site

As a result of completing this proposed project, West Milton expects that by removing its low-head dam, the ecological processes that contribute to high quality habitats elsewhere in the main stem Stillwater River will be restored. More specifically, the project will: 1) remove a significant fish passage barrier that affects not only fish, but mussels that require fish as hosts for reproduction, 2) restore habitat types in the project reach that are presently absent (e.g., riffles,
glides, runs) and thereby restore hydraulic habitat complexity, 3) increase substrate heterogeneity, 4) alleviate water quality issues associated with the impoundment, and 5) shift habitat conditions away from those that favor invasive exotic species such as the common carp. Finally, removal of the West Milton structure will result in the establishment of a 30+ mile contiguous stretch of exceptional quality riverine habitat.

G. Project Implementation

The current estimated construction of this project is $1,381,000, of which $1,331,000 is expected to be provided as WRRSP funds by MSD, while the remainder will come from other federal and local sources. The following table from the village’s WRRSP implementation plan shows how these funds will be used.

<table>
<thead>
<tr>
<th>Table 1. Project Costs</th>
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<tbody>
<tr>
<td>Project Component</td>
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<tr>
<td>Property Costs Category</td>
</tr>
<tr>
<td>Surveying, Field Reconnaissance, Hydro-Facility Assessment and Sediment Study</td>
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<tr>
<td>Community Outreach Activities</td>
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<td>Property Cost Subtotal</td>
</tr>
<tr>
<td>Planning and Design Category</td>
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<tr>
<td>Protection/Restoration Plan Preparation</td>
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<tr>
<td>Design Preparation</td>
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<tr>
<td>Engineering Construction Services</td>
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<td>Planning and Design Subtotal</td>
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<tr>
<td>Habitat Restoration Category</td>
</tr>
<tr>
<td>Dam and Hydro-Facility De-construction</td>
</tr>
<tr>
<td>Sediment Dredge (Pump On-site and place in abandoned tail race)</td>
</tr>
<tr>
<td>Wall Demolition (west river bank)</td>
</tr>
<tr>
<td>Haul Dam, Hydro-Facility, Wall Material Off-site</td>
</tr>
<tr>
<td>Bank Stabilization, River Restoration and Habitat Improvement</td>
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<tr>
<td>Habitat Restoration Costs Subtotal</td>
</tr>
<tr>
<td>Other Miscellaneous Project Costs Category</td>
</tr>
<tr>
<td>Permits, legal services, required surveys</td>
</tr>
<tr>
<td>Monitoring</td>
</tr>
<tr>
<td>Boundary markers</td>
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<tr>
<td>Sign indicating WPCLF/WRRSP funding with an educational component</td>
</tr>
<tr>
<td>Other Project Costs Subtotal</td>
</tr>
<tr>
<td>Total Estimated Project Cost</td>
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</table>
Assuming WPCLF loan award to MSD for its sponsoring project in December 2010, a maximum of $1.331 million in WRRSP funds will be available for this project after final design is completed and the project is bid. Construction is currently expected to start in June 2011 and be completed within five months by November 2011. As WRRSP funds are equivalent to providing West Milton with a "principal-free" loan, the residents of West Milton will not be responsible for repaying the amount shown above and announced in Ohio EPA’s July 2010 Program Management Plan.

H. Environmental Impacts of the Proposed Project

The environmental review conducted in part by Ohio EPA and other review agencies, described herein, indicates that the proposed project to remove the low-head dam on the Stillwater River will not result in significant, adverse direct, indirect, or cumulative environmental impacts on the area shown in Figure 1 above. Where necessary, mitigation has been proposed by West Milton and its consultant to reduce the direct environmental impacts that have been identified by Ohio EPA. More specifically, the mitigation will cover: (1) prohibited construction activities, (2) erosion/sediment control as part of an overall storm water permit, (3) traffic control, (4) air pollution/noise control, (5) tree and vegetation protection, (6) site dewatering, and (7) archaeological and historical resources evaluation. Specific information on each of these topics can be found in the designated sections that follow. Readers should note that all spoil disposal sites must be reviewed and prior approved by Ohio EPA to assure that no indirect adverse environmental impacts on sensitive natural features occur.

Because of the site chosen for this proposed project, its generally well-defined scope, and the mitigation concepts proposed by West Milton’s engineering consultant, Ohio EPA expects that the proposed project will not directly result in significant adverse effects on the natural or human environment. Where there is any potential for direct, indirect, or cumulative impacts on any resources in these two categories, a discussion can be found in the following summary of Ohio EPA’s environmental reviews. Overall, this proposed project is not expected to result in any significant, adverse environmental impacts for the reasons cited below.

Table 1. Project Costs

<table>
<thead>
<tr>
<th>Project Component</th>
<th>Costs/Funds</th>
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<tr>
<td>WRRSP Funds Available</td>
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<tr>
<td>US Fish and Wildlife Service Natural Fish Habitat Grant</td>
<td>$10,000</td>
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<tr>
<td>Local Share</td>
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</tbody>
</table>
1. Major Land Forms

Removal of the low-head dam from the Stillwater River at West Milton will restore the natural, free-flowing habit of this river. As a result, the natural land form and river channel that existed in the impounded area is expected to reappear upon completion of this proposed project. Given the beneficial aspects of this proposed action, Ohio EPA expects that no significant, adverse, direct or indirect, short- or long-term impacts on this environmental attribute of the project area will occur.

2. Surface and Ground Water Resources

As explained above, the main surface water feature in the project area is the Stillwater River. By removing West Milton’s low-head dam and completing the associated work described in more detail above, Ohio EPA expects that the village’s proposed project will result in a free-flowing river capable of fully attaining the exceptional warmwater habitat conditions found in adjacent segments of this surface water resource. In general, typical storm water controls are expected to be sufficient to protect surface water quality during the five to six months that dam removal and related de-construction activities are underway. On this basis, Ohio EPA does not expect any significant, adverse impacts on surface water features within the project area during or after the relatively short duration of this proposed project.

In terms of ground water resources, West Milton and surrounding townships within the immediate project area are generally outside the nearby Great Miami/Little Miami River Basins Buried Valley Aquifer System. For that reason, coordination with US EPA under the Safe Drinking Water Act’s Sole Source Aquifer program was unnecessary on this project. However, the ground water sensitivity (or DRASTIC) map for Miami County shows that ground water recharge areas and associated aquifers immediately along the Stillwater River east and north of West Milton are susceptible to ground water contamination. On that basis, Ohio EPA will require that the contractor working on this project have a ground water pollution prevention and fuel spill containment plan in place during the de-construction activities. Ohio EPA will also encourage consideration of use of biodiesel fuels that may be better suited to use in environmentally-sensitive areas such as along rivers. Accordingly, we have concluded that the proposed dam removal project will not have any significant, adverse impacts on ground water features, or the known ten ground water wells in the vicinity of the project.
3. Aquatic, Terrestrial, and Critical Habitat, including Floodplains and Wetlands

- Aquatic Habitat

As discussed in the previous section, the Stillwater River is the one aquatic habitat that will benefit the most from the proposed dam removal activities. Given the limited scope and duration of the proposed project, along with the mitigative measures proposed by the village’s consulting engineer, Ohio EPA has concluded that the short-term impacts of the proposed deconstruction project on aquatic habitats in the Stillwater River will be insignificant. In return for these relatively short-term (five month long) and minor effects on water quality, the long-term benefit consists of restoring two miles of the Stillwater River to a free-flowing condition. Finally, should any filling and/or dredging of the Stillwater River at or below the dam site be needed to complete this project in accordance with the findings of the sediment study, Ohio EPA expects that all conditions of the pertinent Clean Water Act Section 404 and 401 permits will be adhered to, and so assure that aquatic habitat is properly protected. On this basis, we have concluded that the proposed dam removal project will not have any significant, adverse impacts on this resource attribute.

- Terrestrial Habitat

Based on two aerial maps of the area surrounding the low-head dam near West Milton (see Figures 2 and 3 below), there appears to be a previously cleared corridor most of the way from State Route 48 east to the dam site, as well as a wooded area along the west bank of the Stillwater River. The latter area is likely to have to be cleared, at least partially, to gain access to the former tail race. From photos taken of the tail race area in 2008, the trees found near the site of the dam include sycamores, box elders, hackberries, and cottonwoods. This area is about 1 acre in size. Removing trees from this area is an unavoidable aspect of this proposed project, as removing the low-head dam will require getting large equipment first to the proposed equipment staging area and then down to the dam site itself. Given this limited amount of disturbance and the benefits of the overall project to water quality, Ohio EPA has concluded that these activities should not result in significant, adverse impacts on the terrestrial habitat of the project area. In addition, the village and its consultants have indicated that steps will be taken to restore native vegetation to the river bank upon removal of the dam and related structures. This replacement activity should help compensate for any necessary tree removal.
Critical Habitat

Based on the species of trees present in the immediate project area (see Figure 4 below), Ohio EPA, in consultation with the village, its consultants, and the U.S. Fish and Wildlife Service, has concluded that a small amount of critical habitat suitable for use by Indiana bats as foraging, roosting, and nesting may be present in the project area. Accordingly, the limited presence of snags, the generally poor spacing between trees, and the general lack of other suitable habitat (dead and dying trees of shagbark hickory, shellbark hickory, bitternut hickory, black ash, green ash, white ash, shingle oak, northern red oak, slippery...
elm, american elm, eastern cottonwood, silver maple, sassafras, post oak, and white oak with exfoliating bark, crevices, or cavities in upland areas or riparian corridors, and living trees of these same species with exfoliating bark, cavities, or hollow areas formed from broken branches or tops) suggests that the proposed project will not have any significant, adverse impact on this species or its critical habitat. Other than the terrestrial habitat found along the Stillwater River that might support Indiana bats, no other potential, terrestrial or aquatic, critical habitat supporting other federal- or state-listed endangered, threatened, or special concern species appears to be present in the immediate project area. Should any future U.S. Fish and Wildlife Service comments require additional steps be completed to address Indiana bat concerns, West Milton will need to finish this work as a condition of award of WRRSP funds.

Figure 4, Example of Wooded Area within Project Area

- Floodplains and Wetlands

A defined floodplain for the Stillwater River is established for the area near West Milton (see Figure 5 below). While the removal of the dam will have some effect on the interaction of the river with its floodplain, the original purposes of the dam were apparently for energy production and water supply, not flood control. In addition, the apparent presence of large amounts of sediment behind the dam suggests that its current flood storage capacity is relatively low. On this basis,
Ohio EPA has concluded that the proposed project will have no significant, adverse effect on floodplains in the immediate project area. In a similar way, the absence of previously identified wetlands from the project area supports our conclusion that the proposed dam removal project will have no lasting adverse effect on this environmental feature.

Any downcutting effects that become apparent during and after removal of the dam may require further attention during the project monitoring period required by the appropriate water quality permits.

![Figure 5, Current Flood Insurance Rate Map for West Milton and Vicinity](image)

4. Land Use (including Open Space) and Agriculture

The proposed removal of the West Milton low-head dam is consistent with the Watershed Action Plan for the Stillwater River, and thus with overall land use planning for this portion of Miami County. Accordingly, Ohio EPA does not anticipate that any significant, adverse direct or indirect, short- or long-term impacts on land use and agricultural production should occur as a result of this proposed project.

5. Air Quality

During the relatively short-term (five month) estimated dam removal period, operation of heavy equipment will result in minor increases in air pollution in the project area. This minor increase is an unavoidable result of this proposed
project, but routine use of dust control measures (such as water and calcium chloride) and proper engine maintenance should help limit the amount of air pollutants that will be generated. Upon completion of the proposed project, air quality should return to a pre-construction condition. Accordingly, no significant, adverse direct or indirect, short- or long-term, impacts on air quality are expected. The relatively isolated location of the dam should also help limit air quality impacts on area residents.


Overall, this proposed project and its relatively isolated location suggest that impacts on ambient noise levels, traffic patterns, and local aesthetics should be limited in magnitude and extent during the estimated five month dam removal period. On this basis, Ohio EPA expects that noise and traffic levels will return to a pre-construction condition upon project completion and thus have no lasting impacts on area residents. Similarly, the safety of the workers removing the dam and of the public at large are expected to be of a concern during the five month construction period, but normal safety precautions used on any large construction project should assure that workers and the general public are protected. Following dam removal, Ohio EPA has indicated to the village and its project team that special precautions (e.g., temporary fencing) may be needed to assure that adequate time is provided to allow fine sediments along the river to dry out and so not present a safety hazard to pets and area residents. In addition, elimination of the dam will increase public safety by removing the accessible dam crest (see Figure 6 below) that could be a danger for accidental falls. Finally, while a somewhat subjective matter, Ohio EPA expects that the overall aesthetics of the project area will improve once the low-head dam is removed, banks are re-vegetated with native plants, and a free-flowing river is re-established.

7. Energy Use

In the short-term, non-renewable energy will be needed to run the heavy equipment required to remove the dam and related structures and sediment from the project area. While this projected, relatively short-term energy use is unavoidable, it is a necessary aspect of this project if the goal of restoring the water quality of a two-mile section of the Stillwater River is to be accomplished.
On this basis, Ohio EPA expects that actual energy use required by this project will be consistent with the de-construction of other low-head dams, and will not be a significant long-term draw on local sources. In the long-term, this proposed project will have no negative effects on local energy use and supplies.

8. Archaeological and Historic Resources

An initial review by Ohio EPA (in accordance with its State Environmental Review Procedure for nonpoint source projects) and the Ohio Historic Preservation Office (OHPO) found that the proposed dam removal project as described above and shown in Figures 1 - 6 requires further evaluation before a final decision can be reached about the eligibility of the dam and its surroundings for placement on the National Register of Historic Places. During the upcoming study to be conducted for West Milton by a professional archaeologist/historian, the historical setting and potential eligibility of the project area will be better established in a cultural resources report.

While additional steps (see below) may be needed to complete the review of this proposal under the National Historic Preservation Act Section 106 process, Ohio EPA has determined under its State Environmental Review Procedure that the West Milton dam and related structures would likely not qualify for listing because they: (1) apparently are not associated with events that have made a significant contribution to the broad patterns of our history; (2) seem not to be associated with lives of persons significant in our past; (3) do not embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and (4) as currently understood and constituted (i.e., the dam is in a dilapidated condition within a previously disturbed landscape) are unlikely to yield information important in prehistory or history. In sum, Ohio EPA has concluded that they do not represent a historically significant feature worth keeping. Aside from West Milton’s continued liability associated with the current condition of the dam, the available information on the effects low-head dams typically have on water quality clearly shows that their presence in a watershed is negative. Accordingly, Ohio EPA has concluded that the removal of the West Milton dam will not result in an adverse effect on the archaeological and historic resources of the project area, but will have a positive water quality impact. This conclusion is supported by site visits Ohio EPA has completed, as well as water quality studies performed by this agency.

Based on the forthcoming cultural resources report’s findings, Ohio EPA, in consultation with OHPO and West Milton, will determine if any additional steps will be necessary to document the relevance of the dam and its surroundings. For example, should this study conclude that the dam is potentially eligible for the National Register, Ohio EPA expects that West Milton will continue with the National Historic Preservation Act Section 106 consultation process and, upon
completing the Section 106 process in its entirety, implement a proposal consistent with the outcome of this review. Conversely, if this study concludes that the dam is not potentially eligible and the reviewing agencies concur, then the removal of the dam can proceed as currently proposed.

In addition, readers should note that if any other historic or archaeological resources are found during construction, contractors working on this proposed project will need to stop work and notify the appropriate state officials. Also, WRRSP funds will not be released for any work on the area surrounding the dam until the required report is filed with OHPO and accepted by Ohio EPA, and any other federal or state agencies having an interest in this proposal. These assurances indicate that, whatever the outcome of the pending study and review by government agencies, the proposed project will ultimately have no adverse effect on archaeological or historic resources in the project area.

9. Local Economy

Given the proposed funding package and large amount of “free money” available for this proposed project, Ohio EPA anticipates that the removal of the West Milton dam will have no adverse effect on the local economy. Rather, the jobs the proposed project should sustain will be an added benefit to the local area’s economy. Finally, as the recreational aspects of a free-flowing Stillwater River become apparent in the West Milton area, there should be additional long-term economic benefits to the community, based on what other communities across Ohio have seen once their low-head dams are removed.

I. Public Participation

The following agencies have reviewed, and were provided an opportunity to comment on the proposal to finance the West Milton low-head dam removal project with WRRSP and other funds:

Ohio Department of Natural Resources
Ohio EPA
Ohio Historic Preservation Office
U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service

During the environmental reviews of this proposed project, Ohio EPA, West Milton, and its consultants coordinated fully with these federal and state review agencies. As a result, no significant negative comments about the direct impacts of the proposed project were received from these review agencies. Any concerns were addressed by Ohio EPA and West Milton’s consultants as indicated in the environmental impacts section of this document. Further support for this conclusion is that all necessary reports required by OHPO and the U.S. Fish and Wildlife Service will be filed and reviewed before any WRRSP funds are released.
In addition, the village, the Ohio Department of Natural Resources, and the village’s consultants will be holding public meetings during November to discuss this project more fully and provide local residents with an opportunity to review and comment on the proposed dam removal activities. Given these multiple options during the public comment period on this Environmental Assessment, Ohio EPA has concluded that the public notification and involvement requirements of the WRRSP will be met, and that West Milton will appropriately involve the public in the decision-making process for this dam removal project. These efforts will build on the meeting held on July 14, 2010 to present information on the current condition of the dam and attended by fifty people, plus a vote by West Milton’s council in March 2010 to tear it down.

J. Reasons for a Preliminary Finding of No Significant Impact

Based upon our review of the preliminary restoration plan and other information collected about this project, Ohio EPA has concluded that no significant short-term or long-term adverse direct environmental impacts will result from the project as related to the environmental features discussed in this document. This is because either the features: (1) do not exist in the project area, (2) exist but will not be adversely affected, or (3) the impacts of construction will be temporary and/or mitigated in accordance with provisions to be included in the contract documents. Furthermore, all needed studies to address OHPO’s and the United States Fish and Wildlife Service’s concerns about this proposed project will be completed before any relevant permits are issued and WRRSP funds are released to West Milton. For these reasons, this project, alone or in combination with other projects, is not expected to result in any significant indirect or cumulative short-term or long-term adverse environmental impacts. Overall, this proposed project is expected to re-create a natural, free-flowing condition in the Stillwater River where a two-mile long stagnant impoundment now exists.

K. For further information, please contact:

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