

**February 6, 2026**

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

**City of Newark – Licking County  
16 North Separation – Phase 1  
Loan number: CS390654-0031**

The attached Limited Environmental Review (LER) is for a wastewater collection project in Newark which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, costs, and expected environmental benefits. Making available this LER fulfills the 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 program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. In accordance with Ohio Administrative Code 3745-150-05, this project meets the criteria for an LER rather than the more comprehensive Environmental Assessment. More information can be obtained by contacting the person named at the end of the attached LER.

Upon issuance of this Final 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,



Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance

## **LIMITED ENVIRONMENTAL REVIEW**

### **Project Identification**

Project: 16 North Separation – Phase 1

Applicant: City of Newark  
40 West Main Street  
Newark, Ohio 43055

Loan Number: CS390654-0031

### **Project Summary**

The City of Newark has applied for funding from Ohio EPA’s Water Pollution Control Loan Fund (WPCLF) for the 16 North Separation – Phase 1 project. The project is intended to separate and replace aged and failing combined sewers and install new storm sewers to address Newark’s long-term control plan (LTCP), and to reduce basement backups and combined sewer overflows (CSOs)<sup>1</sup>. The total estimated loan for the project is \$43,637,261, with construction scheduled to begin spring 2026 and be completed in 27 months. The project is eligible for \$4 million in principal forgiveness.

### **History & Existing Conditions**

Located within Licking County, Newark owns and operates a wastewater treatment plant (WWTP) serving approximately 47,000 residential customers, as well as numerous commercial and industrial customers. The WWTP is designed to treat an average flow of 8 million gallons per day (MGD) of wastewater, and the current treatment capacity is 26 MGD. Treated effluent is discharged to the Licking River. Newark currently limits the flow at the influent of the WWTP to 20 MGD, diverting any additional combined flow to the High-Rate Treatment (HRT) facility that is located adjacent to the WWTP, which also discharges to the Licking River.

Newark’s collection system service area encompasses roughly 9,000 acres and is primarily within the municipal city limits. Newark’s collection system consists of approximately 200 miles of combined and sanitary sewers, and 16 sanitary lift stations. Combined sewers make up approximately 18% of Newark’s collection system. Various sections of Newark’s sewers will be approaching the end of their useful life within the next 20 years. Recently Newark has adopted an integrated approach to address

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<sup>1</sup> Combined sewer systems are sewers that are designed to collect rainwater runoff, domestic sewage, and industrial wastewater in the same pipe. Most of the time, combined sewer systems transport all of their flow to a sewage treatment plant where it is treated and then discharged to a water body. During periods of heavy rainfall or snowmelt the combined flow volume in a combined sewer system can exceed the capacity of the sewer system or treatment plant. For this reason, combined sewer systems are designed to overflow occasionally (combined sewer overflow) and discharge excess combined sewage directly to nearby streams, rivers, or other water bodies.

their aging combined sewers as part of their asset renewal program, in conjunction with providing CSO control. Newark has initiated replacing their aging combined sewers in the downtown area with new sanitary and separate storm sewers. In addition, Newark is constructing green infrastructure in many of the project areas to provide additional water quality benefits to the receiving stream.

There are currently 27 CSO diversion structures with 22 outfalls that discharge combined overflows to Raccoon Creek, South Fork Licking River, and North Fork Licking River, as authorized by Ohio EPA. All but one of these CSOs are active in a typical year.

USEPA required Newark to develop a plan to address CSO discharges. In September 1998, Newark submitted to Ohio EPA its Phase I Combined Sewer System Long Term Control Plan (LTCP), and the Phase I Combined Sewer LTCP Addendum in June 2004. The addendum to the Phase I LTCP identified a plan to transport more wet-weather flows to the existing WWTP and a physical/chemical high-rate system to treat the increased peak flows at the WWTP. This recommendation was accepted by Ohio EPA, and a compliance schedule was included in the NPDES permit that became effective August 1, 2006, with a modification being effective December 1, 2007. LTCP Phase I projects included the CSO Optimization project, and the DEFA-funded Interceptor Siphon and Operational Optimization, and Fourth Street (Route 13) Sewer Separation projects.

Per the most recent National Pollutant Discharge Elimination System (NPDES) permit, Newark was required to prepare an LTCP Phase II. Newark submitted a draft of this plan to Ohio EPA in December 2016. The draft LTCP Phase II provided a prioritized, phased, and integrated approach for implementation of recommended projects to address Newark's remaining CSOs.

As part of the LTCP Phase II, Newark identified four priority asset renewal areas that include aging sewers, trunk sewers in most need of repair, maintenance issues, historic occurrences of surface flooding and basement backups, older water mains, and future plans for urban renewal. LTCP Phase II projects include the South Second Street Interceptor and 16 North Separation projects.

The 16 North Separation project includes sewer separation for the existing combined sewer system in the Mount Vernon Road and Hudson Avenue corridors north of downtown. As both of these corridors are main thoroughfares into downtown, Newark expressed concerns related to the construction schedule, magnitude of work in the two high-traffic corridors, construction impacts to residents, and high construction costs. Newark requested that the project be split into two phases, and Ohio EPA agreed to this request.

Phase 1 of the 16 North Separation includes the separation of the Mount Vernon Road corridor (including Mount Vernon Road, Moull Street, Fairfield Avenue, Jefferson Street, and Rugg Avenue), and construction of a new 48-inch-diameter storm relief sewer along Mount Vernon Road. Additional separation is planned along the North Street storm relief sewer, which will provide additional control at CSO 1004.

Phase 2 of the 16 North Separation includes the complete separation of the Hudson Avenue corridor north of Saint Clair Street to Stevens Street. Anticipated construction of Phase 2 is from third quarter of 2028 through early 2031.

### **Project Description**

The proposed project (see figures 1 and 2) is designed to address Newark's LTCP and to reduce CSOs, by replacing combined sewers and installing new storm sewers. Construction will include installation of 11,677 linear feet (LF) of 8- to 18-inch-diameter sanitary sewer pipe, 2,844 sanitary lateral reconnections, 15,415 LF of 12- to 48-inch-diameter stormwater pipe, 287 downspout disconnections, and 13,245 LF of 3- to 20-inch-diameter water mains. Specifically, the proposed project will include the following actions:

- Full sewer separation of Rugg Avenue, Jefferson Street, Fairfield Avenue, and Moull Street that have had past basement backup incidents due to small, shallow combined sewers. New separate storm sewers and downspout disconnection will alleviate potential for future basement backups.
- New storm relief along North Street. All runoff captured by new storm sewers in the Mount Vernon Road corridor, north of North Street, will be redirected to the North Fork Licking River. The storm flows redirected to the new storm sewers provide interim control at CSO 1013.
- Redirection of the flow from existing storm inlets east of Hudson Avenue along North Street to the new storm relief sewer. This provides partial separation of the combined system influent to CSO 1004 and will provide immediate control to CSO 1004 that is not included in the LTCP Phase 2.
- Elimination of the existing 18-inch-diameter sanitary sewer crossing of Log Pond Run at Commodore Street to coordinate with an Ohio Department of Transportation bridge culvert replacement project. Flows from this sewer will be redirected upstream and downstream of Log Pond Run within the sewer system.
- Work also includes restoration of sewer service connections, water line replacement, and restoration of pavement, drives, and curbs. Construction activities will primarily include open-cut installation in previously disturbed rights-of-way (streets, sidewalks, driveways, areas of buried utilities).

### **Implementation**

The total estimated loan amount for the proposed project is \$43,637,261, all of which the City of Newark proposes to borrow from the Ohio Water Pollution Control Loan Fund (WPCLF). The project is eligible for \$4 million in principal forgiveness, which will not need to be repaid. The balance qualifies for the standard WPCLF below-market interest rate on 30-year construction loans, which for February is 3.44% (WPCLF loan interest rates are set monthly, and the rate may change for this loan). Borrowing \$44 million at 3.44% will save Newark approximately \$11,900,000 over the life of the loan compared to the current market rate of 4.74%.

Newark will recover debt associated with the project with revenue generated by monthly sewer fees. The 2026 monthly residential sewer rate in the project area is \$30.93, or \$371 per year, compared to the state average of \$528.

### **Public Participation**

Newark has held various public meetings to notify residents and businesses about the project, including virtual meetings, meetings with affected businesses, meetings to discuss temporary effects on traffic, and meetings with local community groups. Newark also has project information on its website and plans to continue public outreach throughout the project.

Ohio EPA is unaware of any controversy about or opposition to this project. The Limited Environmental Review (LER) and Finding of No Significant Impact (FNSI) will be posted on the Ohio EPA Division of Environmental and Financial Assistance website. Additionally, the LER and FNSI have been provided to the City of Newark to be made available according to their public notification procedures. Thus, there have been adequate opportunities for information dissemination and public participation.

### **Conclusion**

The proposed project meets the criteria for an LER; namely, it is an action within an existing public wastewater collection system, which involves the functional replacement of and improvements to existing infrastructure. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

**Will have no significant environmental effect and will require no specific impact mitigation** as construction will not adversely affect any special resource type, general construction environmental protections will be in place, the project has been coordinated through U.S. Army Corps of Engineers permitting, construction actions will be timed to mitigate impacts to fish and mussel habitat, and potential bat roosting trees. Mitigation measures include typical erosion control and construction best management practices.

The State Historical Preservation Office reviewed documentation, including *History/Architecture Investigations for the 16 North Separation Project in the City for Newark, Licking County, Ohio*, and *Addendum to History/Architecture Investigations for the 16 North Separation Project in the City for Newark, Licking County, Ohio*, and agreed with Ohio EPA that the project would have no adverse effect on historic resources. The project will have human health and environmental benefits of reducing risks related to potential human contact with raw sewage and the associated nutrient discharge to streams from CSOs.

**Will have no effect on high-value environmental resources** as there are no known sensitive environmental resources within the proposed project area. The proposed work will take place within urban areas, in which the predominant cover is pavement, sidewalks and lawn grass, with extensive development and prior excavation.

**Is cost effective** as the proposed action was evaluated as the most cost-effective alternative to address Newark's LTCP and necessary improvements to stormwater and wastewater storage and conveyance within the existing system.

**Is not a controversial action** as nominal local rate increases have been instituted to pay for various improvements to Newark's wastewater collection and treatment system in response to Newark's required LTCP. The rates that Newark applies to its general service area are affordable. It will have no effect on population, nor will it have significant adverse environmental effects that could raise public concern.

**Does not create a new, or relocate an existing discharge to surface or ground waters, and 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** as the project involves improvements to and replacement of infrastructure to address Newark's LTCP to reduce CSOs, and does not require the expansion of Newark's wastewater treatment facility beyond its current design capacity, the installation of a satellite treatment facility, or other action that could increase discharges or add or relocate discharge points.

**Will not provide capacity to serve a population substantially greater than the existing population** as the project is not related to serving new growth or increasing capacity at the wastewater treatment facilities.

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 environmental features. 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. Once implemented, the project will help Newark improve its wastewater collection system by replacing and upsizing aged infrastructure, reducing public and environmental health risks related to the CSO discharges, in turn improving water quality in the Licking River. Also, by using WPCLF financing, Newark has minimized the project cost.

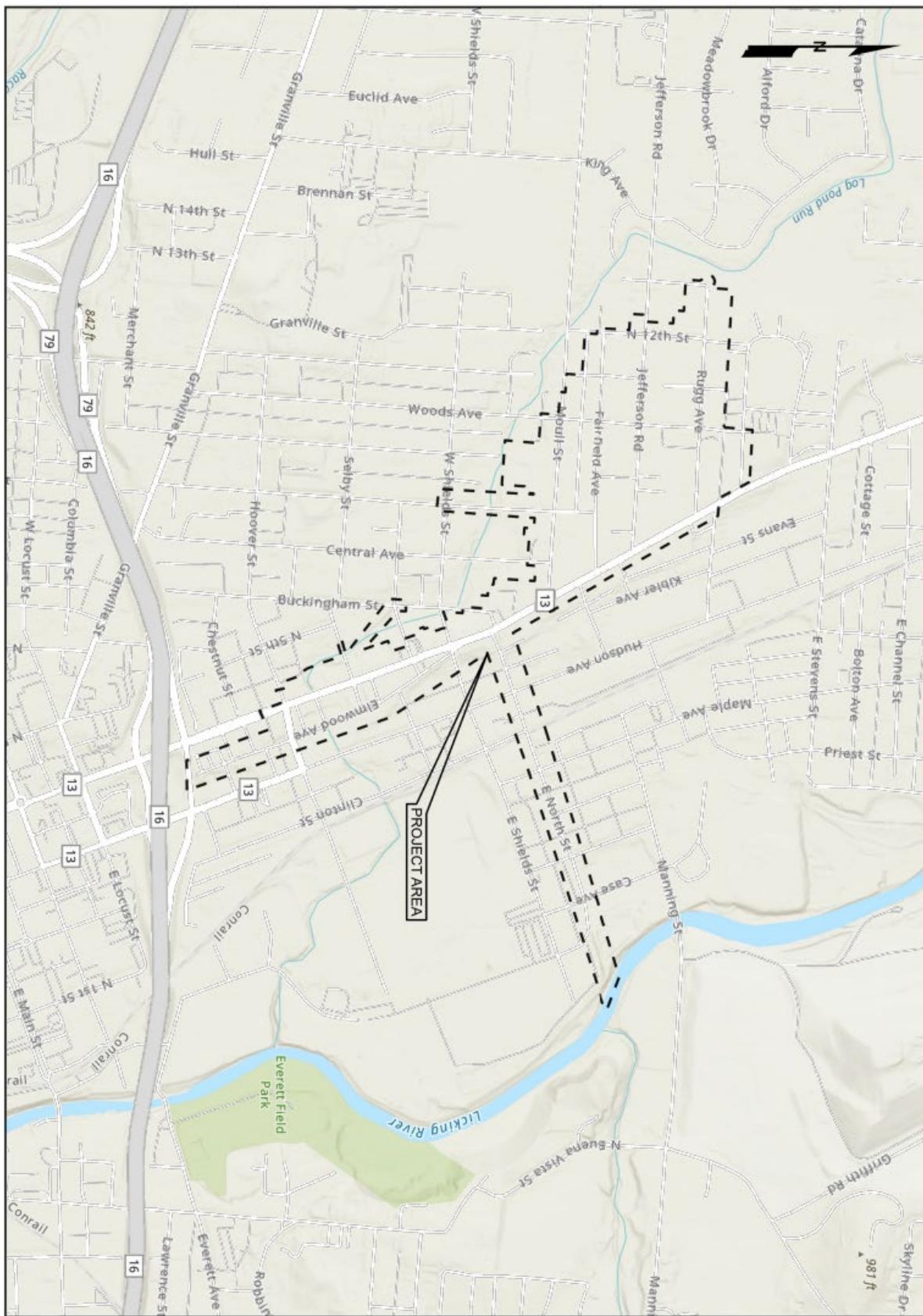
### **Contact Information**

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**Figure 1. General project area**



**Figure 2. Project area**