



Mike DeWine, Governor
Jon Husted, Lt. Governor
Anne M. Vogel, Director

May 31, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Newark – Licking County
Lead Service Line Replacement Project #3
Loan number: FS390654-0025**

The attached Limited Environmental Review (LER) is for a drinking water distribution project in Newark 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,

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project Name: Lead Service Line Replacement Project #3

Applicant: City of Newark
34 South Fifth Street
Newark, Ohio 43055

Loan Number: FS390654-0025

Project Summary

The City of Newark (see Figure 1) in Licking County has requested \$2,858,070 from the Ohio Water Supply Revolving Loan Account (WSRLA) for the Lead Service Line Replacement Project #3 to replace lead service lines (LSL) in Newark's water distribution system. Up to 53% of the \$2,858,070 loan will be in the form of principal forgiveness, a loan that does not need to be repaid. Due to the nature of the project, environmental impacts will be minimal. Construction is scheduled to begin in summer 2023 and last approximately 12 months.

History & Existing Conditions

The City of Newark, located in Licking County, is a community of approximately 50,000 residents, that owns a surface water sourced water treatment plant (WTP) with a design capacity of 15 million gallons per day (MGD), and an average flow of 8 MGD. A large portion of the city has older (greater than 75 years) housing and generally older plumbing to homes. Lead service lines have been encountered in various sections of the city's distribution system, and Newark is evaluating and prioritizing replacement of a portion of its approximately 18,500 service lines annually. Prioritization is based on known deficiencies, leaks and/or lead or galvanized service material. The proposed project is the third phase of Newark's lead service line replacement activities.

Project Description

The proposed Lead Service Line Replacement Project #3 will replace approximately 400 lead service lines in Newark's distribution system (see Figure 2). Line replacement will take place on both the public and private sides of the water service.

Work for the project will be restricted to 7:00 am to 6:00 pm and include temporary traffic controls. The city will also arrange for traffic safety measures, erosion control measures, restoration of all areas, and spoil disposal. Water will be temporarily shut off during pipe replacement.

Implementation

The total estimated project amount is \$2,858,070, and Newark will receive up to 53% of the loan in the form of principal forgiveness, a loan that does not need to be repaid. Additionally, Newark plans to utilize approximately \$148,000 of its American Rescue Plan Act (ARPA) stimulus monies to fund

the project. The balance will be financed through a WSRLA 20-year, zero percent loan. During the standard 20-year loan period, Newark will save up to \$548,000 by using a WSRLA zero percent loan, compared to borrowing the total project amount at the current market rate (June 2023) of 3.75%.

The average annual residential water bill in Newark is \$334, which is 0.69% of local median household income (MHI; \$48,609) and compares favorably to the Ohio average bill, \$749.

Public Participation

The project has been discussed in open council meetings, on social media, and in local news media. All customers affected by this project have submitted a signed customer work agreement allowing the city to perform the required water line replacement. Additionally, the city has a lead service line website and an interactive lead service line map where customers can search by address to identify water service line material. Contractors are required to notify property owners at least 72 hours in advance of work on their property.

Ohio EPA is unaware of the controversy about or opposition to this project and the Limited Environmental Review and Finding of No Significant Impact will be posted on City of Newark and Ohio EPA Division of Environmental and Financial Assistance websites.

Conclusion

Due to the nature of the proposed improvements, and the limited, previously disturbed locations where lead service lines are typically sited, Ohio EPA has determined that these project activities should have no significant adverse effect on major land forms, terrestrial or aquatic habitat, rare or endangered species, surface water, ground water, wetlands, floodplains, land use patterns, agriculture, air quality, archaeological and historical resources, noise, traffic, aesthetics, energy resources, or the local economy. Public health threats will be reduced by eliminating existing sources of lead in drinking water.

The proposed Lead Service Line Replacement Project #3 is a water system infrastructure improvement (rehabilitation of existing facilities) that qualifies for a Limited Environmental Review (LER) and meets the following additional criteria for an LER:

Will have no significant environmental effect, does not require extensive specific impact mitigation, and will have no effect on high-value environmental resources. Construction will be done in the existing right-of-way and in lawns in developed residential locations that lack important environmental resources. Due to the nature of the work to replace private lead service lines using an excavation tool, any impacts will be minimal to non-existent. Little to no tree removal is expected to take place as part of this project. Temporary water service interruptions will be communicated to affected customers.

Is cost effective. There is no feasible alternative to replacing lead service lines.

Is not controversial. Newark and Ohio EPA are unaware of controversy about or opposition to this project. This project will have no impact on residential water rates.

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, 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. The project will merely improve existing infrastructure and eliminate a threat to public health and have no effect on water withdrawal, treatment, discharge, or water source.

Will not provide capacity to serve a population substantially greater than the existing population. The project involves replacing existing lead service lines in Newark and does not impact capacity.

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. Applicable construction impact mitigation measures and practices will be followed, and the project will eliminate lead material from drinking water lines, which will reduce public health threats.

Contact information

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Figure 1 - General project area

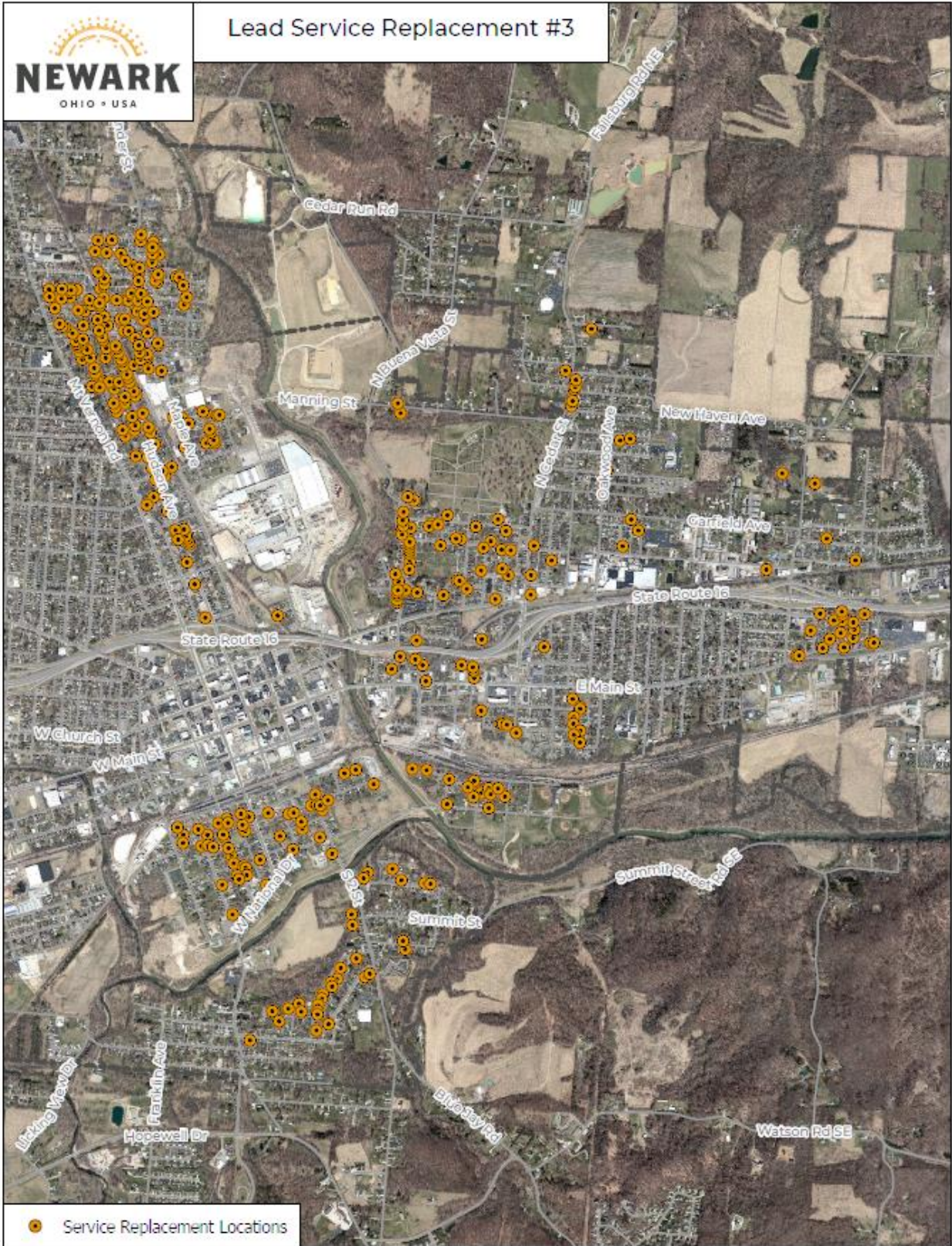


Figure 2 - General project area