



December 30, 2024

Limited Environmental Review and Finding of No Significant Impact

**City of Newark – Licking County
Lead Service Line Replacement Project #6
Loan number: FS390654-0029**

The attached Limited Environmental Review (LER) is for a water distribution improvement project in Newark which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Supply Revolving Loan Account (WSRLA) 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,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Lead Service Line Replacement Project #6

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

Loan Number: FS390654-0029

Project Summary

The City of Newark has requested funding from the Ohio Water Supply Revolving Loan Account (WSRLA) for the Lead Service Line Replacement Project #6 to replace lead service lines (LSLs) in Newark's water distribution system. The estimated loan amount for this project is \$3,503,264, with construction scheduled to begin February 2025 and last approximately 18 months.

History & Existing Conditions

The City of Newark (see Figure 1), 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 sixth phase of Newark's LSL replacement activities.

Project Description

The proposed Lead Service Line Replacement Project #6 will replace approximately 500 LSLs 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 loan amount is \$3,503,264, 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. The balance will be financed

through a WSRLA 20-year, 0% loan. During the standard 20-year loan period, Newark could save up to \$753,000 by using a WSRLA 0% loan, compared to borrowing the total project amount at the current market rate (January 2025) of 3.96%.

Debt for the project will be repaid from monthly water rates without rate increases for the specific areas served by the improvements. The local median household income (MHI) is \$56,284. Under the water rates that will be effective in 2025 and based on a usage of 4,000 gallons of water per month, the average residential water bill is \$23.04 per month, or \$276 per year, as compared to the state average of \$477.

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 an LSL website and an interactive LSL 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 LSLs 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 #6 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 LSLs 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 LSLs 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

R. Eric Schultz
Division of Environmental & Financial Assistance
Ohio Environmental Protection Agency
PO Box 1049
Columbus, Ohio 43216-1049

Email: eric.schultz@epa.ohio.gov



Figure 1 - General project area



Figure 2 – Project area