



August 23, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Springfield – Clark County
Northern Avenue Utilities Upgrades
Loan numbers: FS390880-0020, CS390880-0019**

The attached Limited Environmental Review (LER) is for one drinking water project and one wastewater project in Springfield which the Ohio Environmental Protection Agency intends to finance through its Water Supply Revolving Loan Account (WSRLA) and Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan programs. The LER describes the projects, their 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/WPCLF program review and approval process. We have concluded that the proposed projects should not result in significant adverse environmental impacts. These projects' 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,

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

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Projects: Northern Avenue Utilities Upgrades

Applicant: City of Springfield
76 East High Street
Springfield, Ohio 45502

Loan Numbers: FS390880-0020, CS390880-0019

Project Summary

The City of Springfield has requested financing from Ohio's Water Supply Revolving Loan Account (WSRLA) and Water Pollution Control Loan Fund (WPCLF) for the Northern Avenue Utilities Upgrades. The project will replace an existing water line, lead service lines, combined sewer line, and install portions of new, separated storm and sanitary sewers. Due to the project area already being disturbed and the limited nature of the work, environmental impacts will be minimal and temporary.

History & Existing Conditions

Springfield is located in central Clark County (see Figure 1) and operates their own drinking water and wastewater utilities, including the associated distribution and collection systems. The existing water line and sewer line on Northern Avenue are failing and in need of replacement.

Homes in the project area are more than 100 years old. Based on the age of these homes and existing records, the city expects 115 properties will require replacement of water service lines due to the presence of lead. The existing 6-inch water line serving a portion of this street was installed circa 1920; it is only buried 26 inches deep (versus the normal minimum of four feet).

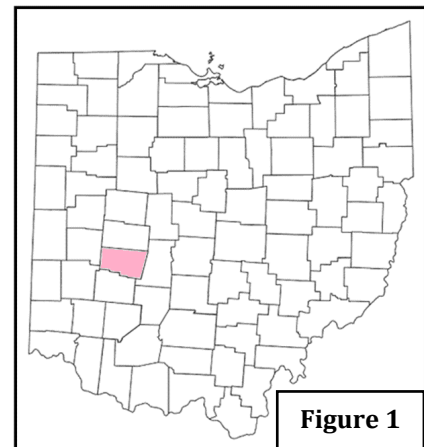


Figure 1

The failing combined sewer currently in place is made of segmented clay tile and serves over 600 residential and commercial properties. At least five of the properties in the area are known to experience sewage backups during heavy rainfall events when the combined sewer system becomes overwhelmed with stormwater. There are two combined sewer overflows (CSO), discharging to an unnamed tributary of Buck Creek, that are active during wet weather events; the city is under a CSO long-term control plan with a goal to eventually capture at least 85% of the volume of combined sewer wet weather overflows.

The pavement above the combined sewer and water lines is in poor condition and needs replacement.

Project Descriptions

Water Line and Lead Service Line Replacement – WSRLA

The proposed project will replace approximately 500 linear feet (LF) of 6-inch water line on Northern Avenue from Murray Street to Rodgers Drive. Additionally, while the existing road surface is already being disturbed to prepare for repaving, 115 properties on the same road will have their lead service lines (LSL) replaced on both the public and private sides as necessary.

Combined Sewer Separation and Sanitary Sewer Extension - WPCLF

The proposed project will replace approximately 1,150 LF of failed combination sewer with new 30-inch pipes. The project will also install 1,800 LF of new storm sewer and 260 LF of new sanitary sewer to separate four homes and a catchment area of nearly 39.5 acres from the existing combined sewer system. This would eliminate one CSO and reduce the number of wet weather overflows at another outfall, improving the quality of receiving waters.

The surface of Northern Avenue from Limestone Street to Cedarview Drive (see Figure 2 below) is in poor condition and already targeted for repaving; completing all of the work together minimizes the number of disruptions to residents. One lane, two-way traffic will be maintained for the full duration of construction.

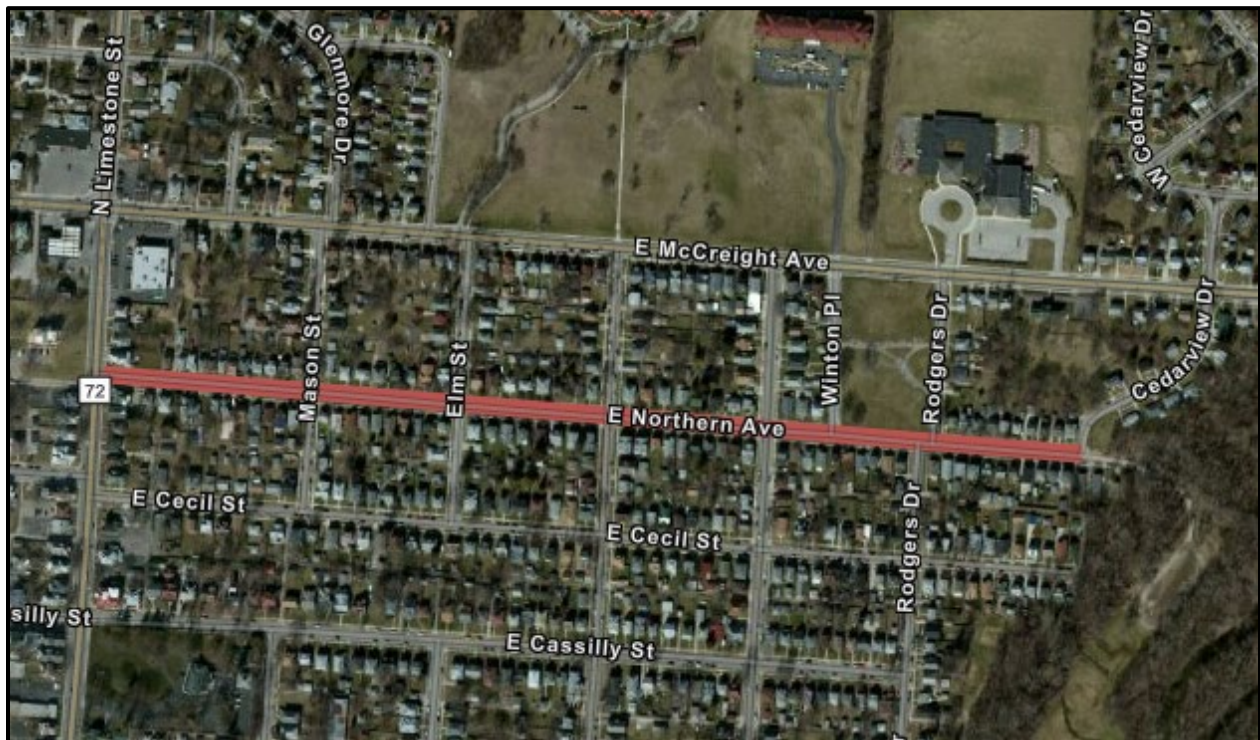


Figure 2. The project area on Northern Avenue between Limestone Street and Cedarview Drive

Implementation

Water Line and Lead Service Line Replacement – WSRLA

Springfield requested \$1.28 million from the WSRLA for the drinking water component of the Northern Avenue Utilities Upgrades project. The city is eligible to receive a portion of the project cost associated with LSL replacement as principal forgiveness, which does not need to be repaid. Any remaining balance related to LSL work will receive an interest rate of 0%, and the balance related to water line replacement will receive the standard rate of 2.86%. The standard interest rate is set monthly and may change for a later loan award.

Springfield residents pay on average \$231 annually for drinking water, which is approximately 0.6% of the median household income (MHI) (\$39,344). This compares favorably to the average annual Ohio water bill of \$697. There are no planned rate increases as a result of this project.

Combined Sewer Separation and Sanitary Sewer Extension - WPCLF

Springfield requested \$2.86 million from the WPCLF for the wastewater component of the Northern Avenue Utilities Upgrades project. The city is eligible to receive up to \$189,301 as principal forgiveness, which does not need to be repaid. The remaining loan will receive the standard interest rate of 2.86%, which is set monthly and may change for a later award date. Residents pay on average \$439 annually for wastewater service, which is approximately 1.1% of the city's MHI. This compares favorably to the average annual Ohio sewer bill of \$639.

Construction on both projects is expected to begin October 2023 and last about a year.

Public Participation

The city has arranged access agreements with affected residents. As part of that process, letters were sent to each property owner explaining the projects and the anticipated time frame of construction. A second letter was sent prior to the completion of survey work. For the type of project and expected impacts, this is considered sufficient.

Ohio EPA is unaware of controversy about or opposition to this project. Ohio EPA will make a copy of this document available on the following webpage and can provide it upon request:

<https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements>

Conclusion

The proposed projects meet the criteria for a Limited Environmental Review (LER); namely, they are actions within existing public wastewater, stormwater, and drinking water infrastructure which involve the functional replacement of and improvements to components therein. Furthermore, the projects meet the other qualifying criteria for an LER; specifically, they:

Will have no significant environmental effect, require no specific impact mitigation, and have no effect on high-value environmental resources because all of the work takes place in previously disturbed areas and rights-of-way that lack any important environmental resources. The streets will be restored upon completion of construction.

Are cost effective because the selected actions present the best alternatives to address the necessary improvements. For the drinking water project, the replacement of failing water lines is more cost effective than continued repair, and there is no alternative to replacing LSLs. For the wastewater

project, the work will perform a necessary correction of a combined sewer line as no action would leave both CSOs active.

Are not a controversial action because rates are not increasing, and residents have been properly informed of the upcoming work. Springfield and Ohio EPA are unaware of controversy about or opposition to this project.

Do not create a new, or relocate an existing discharge to surface or ground waters, do 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, or substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters since the drinking water project is merely replacing existing infrastructure components and the sewer project is actually decreasing the amount of pollutants in local waters by eliminating a CSO reducing overall wet weather flow.

Will not provide capacity to serve a population substantially greater than the existing population because the projects are only replacing or improving existing components and no new services will be installed.

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 projects as they relate to the environmental features discussed previously. 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.

As a result of these projects, residents of Northern Avenue will have more reliable drinking water with removed threat of lead service lines. Additionally, five homes will no longer experience sewer backups and the water quality of Buck Creek will improve when wet weather overflows are reduced.

Contact Information

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