



**September 16, 2024**

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

**City of Springfield – Clark County  
Selma Road Water Service Replacement  
Loan number: FS390880-0022**

The attached Limited Environmental Review (LER) is for a lead service line replacement project in Springfield 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,

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

Project: Selma Road Water Service Replacement

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

Loan Number: FS390880-0022



Figure 1. Clark County

## Project Summary

The City of Springfield has requested funding from the Ohio Water Supply Revolving Loan Account (WSRLA) for their Selma Road Water Service Replacement project. Work for this project will include replacing public and private lead service lines along Selma Road in Springfield. Due to the nature of the work, environmental impacts will be negligible.

## History & Existing Conditions

The City of Springfield is located in Clark County (Figure 1). Springfield owns and operates a water treatment plant (WTP) and distribution system. This distribution system is known to have lead components, which Springfield has been steadily working to remove due to the health hazard posed by lead in a drinking water system.

This project will remove lead on both the public and private side of the water system. The public side includes the water main in the street and the service line up to the property boundary. The private side includes the service lines from the property boundary up to the residential building. See Figure 2 below for an example.

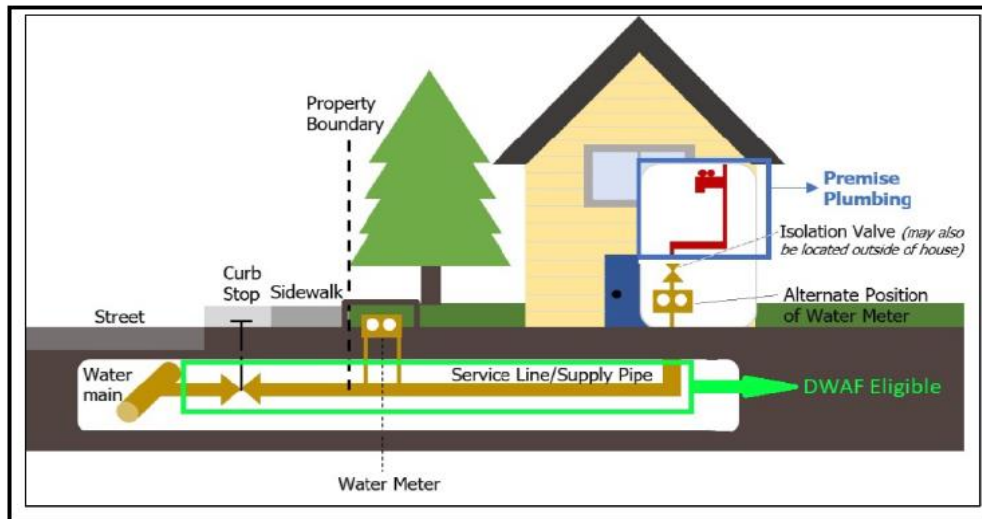


Figure 2. General illustration of a typical lead service line replacement

**Project Description**

The project will replace lead service lines on the public and private side in 70 locations, as well as 35 additional private side only replacements.

The project area consists of residential neighborhoods and roads that have been previously disturbed by the installation of the existing service lines and other underground utilities. As a result, no sensitive environmental resources such as streams, wetlands, state or federal threatened or endangered species, or historic properties will be impacted. No trees are expected to be cleared as part of the installation of the new service lines. See Figure 3 below for a map of the project area.



**Figure 3. Map of project area**

## **Implementation**

The City of Springfield proposes to borrow approximately \$1,000,000 from the Ohio WSRLA at an interest rate of 0%. This loan is eligible for partial principal forgiveness, a type of loan that does not need to be repaid.

Springfield will not be raising rates in order to pay for this project. The average annual water bill for residents served by Springfield is \$215. This is 0.5% of the median household income (MHI: \$42,131) and compares favorably to the Ohio average annual water bill, \$477. Construction is scheduled to begin November 2024 and to be completed in approximately eight months.

## **Public Participation**

The City of Springfield will be mailing letters to property owners that will be affected by this project. Permission to work on private property will be obtained prior to starting construction.

Ohio EPA is unaware of controversy about or opposition to this project. Ohio EPA will make a copy of this document available to the public on its web page: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements> and provide it upon request to interested parties.

## **Conclusion**

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing water distribution system, which involves the functional replacement of existing lead service lines. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

**Will have no significant environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources** because no environmentally significant resources are likely present in the prior-disturbed road rights-of-way or residential properties where lead service lines will be replaced.

**Is cost effective and is not a controversial action** because there is no feasible alternative to removing lead service lines. Ohio EPA is unaware of opposition to or controversy about the project.

**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, or substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters, and will not provide capacity to serve a population substantially greater than the existing population** because this project merely replaces existing drinking water infrastructure that services an existing population with no additional withdrawal or discharge to surface waters.

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 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. This project will reduce residents' sources of exposure to lead.

**Contact Information**

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