



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

September 29, 2022

Limited Environmental Review and Finding of No Significant Impact

**City of Willard – Huron County
Park Street Water Line Replacement
Loan number: FS390996-0012**

The attached Limited Environmental Review (LER) is for a drinking water project in Willard 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". The signature is written in a cursive, flowing style.

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Park Street Water Line Replacement

Applicant: City of Willard
631 South Myrtle Avenue
P.O. Box 367
Willard, Ohio 44890

Loan Number: FS390996-0012



Figure 1. Huron County

Project Summary

The City of Willard, in Huron County (Figure 1), has requested \$896,000 from the Ohio Water Supply Revolving Loan Account (WSRLA) to fund the Park Street Water Line Replacement project. This project involves the replacement of water mains and service lines in a portion of Willard's water distribution system.

History & Existing Conditions

Willard owns and operates a public water system (PWS) that consists of a 215-acre, 2.3-billion-gallon upground reservoir, a water treatment plant with a design capacity of 3.2 million gallons daily (mgd), a distribution system consisting of approximately 55 miles of water mains, and two elevated storage tanks with a total storage capacity of 1.3 million gallons. Willard provides an average of 1.3 mgd to over 8,300 residents across Willard and Plymouth, as well as to Northern Ohio Rural Water.

Over the last several years, Willard has been improving their distribution system by replacing 4-inch cast iron water mains that were installed over 60 years ago. Due to age and material, these water mains have experienced deterioration and reduction in capacity from rust and sediment build up. Most private service lines encountered during previous water main replacement projects have been galvanized steel, but some lead service lines were also found.

Willard intends to continue improving their distribution system through completion of this project. The service lines that will be replaced as part of this project represent roughly one third of the remaining lead service lines in the city.

Project Description

Willard intends to replace an estimated 2,650 linear feet of 4-inch cast iron water mains with 6-inch polyvinyl chloride (PVC) water mains, along with hydrants, valves, fittings, and associated appurtenances along Park Street (Figure 2). Also included is the replacement of 92 public and private galvanized steel and lead service lines. Water main and service line replacements will take place along Park Street, from Emerald Street to Whisler Drive.

Implementation

Willard proposes to borrow \$896,000 in the form of a 10-year loan from the Ohio WSRLA to fund this project. Willard qualifies for the small-community rate of 1.76 percent (interest rates are set monthly and may change for the requested October award date) and is eligible to receive a portion of the project cost associated with lead service line replacement as principal forgiveness.

The debt associated with this project will be recovered from user charges. The average annual water bill for residents served by Willard in 2021 was \$239. This is 0.57 percent of the median household income for Willard (MHI; \$41,696) and compares favorably to the Ohio average annual water bill of \$697.

Construction is expected to begin in December 2022 and be completed in July 2023.

Public Participation

Willard has discussed this project, along with its other water, wastewater, and stormwater projects, at public city council meetings. Willard holds council meetings the first and third Mondays of each month. Information regarding these meetings, meeting minutes, and recent legislation is available on Willard's webpage: <https://www.willardohio.us/legislation.html>.

Letters regarding this project were sent to affected residents in May 2022. Included with each letter was a work agreement requesting permission from property owners to allow the city contractor to conduct service line replacements on private property. Willard intends to work with the contractor to notify residents in advance of construction outside of their homes through Facebook and door hangers.

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 the following webpage and will provide it upon request: <https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>.

Conclusion

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

Will have no significant environmental effect, will have no effect on high-value environmental resources, and will require no specific impact mitigation. Water main and service line replacements will take place in a developed neighborhood within paved roads, sidewalks, lawn strips, and front lawns. These areas lack suitable habitat for state and federally listed endangered and threatened species, unique terrestrial and aquatic habitat, surface waters, archaeological and historically resources, and other sensitive and valuable resources. Specific measures beyond standard construction best management practices to minimize erosion and sediment, noise, dust, and traffic disruptions are not expected to be necessary for this project.

Is cost effective. Due to the deterioration of the cast iron water mains, as well as the reduction in capacity the water mains have experienced due to rust and sediment build up, replacement of the

water mains with new PVC water mains meeting current size standards was determined to be the best and only viable alternative.

Is not a controversial action. Willard conducts an annual review of their water rates to determine if adjustments are needed. While there is a planned increase in Willard's water capital fund amount for 2023, it is not specifically due to or meant to pay for this or any one specific project. Willard intends to use lead service line principal forgiveness to cover a portion of the cost to replace service lines, estimated to be \$5,000 to \$6,000 per service line, reducing this expense for residents.

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, does not 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 the capacity to serve a population substantially greater than the existing population. This project merely involves the replacement of water mains and service lines that serve existing customers and will not otherwise have any effect on Willard's PWS (e.g., withdrawal, treatment, storage, distribution, usage, etc.).

The planning review of this project identified no potentially significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources (surface waters, coastal zones, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeological and historically significant sites, threatened and endangered species, or state and federal wildlife areas). Rather, completion of this project will improve the reliability and safety of Willard's water distribution system.

Contact information

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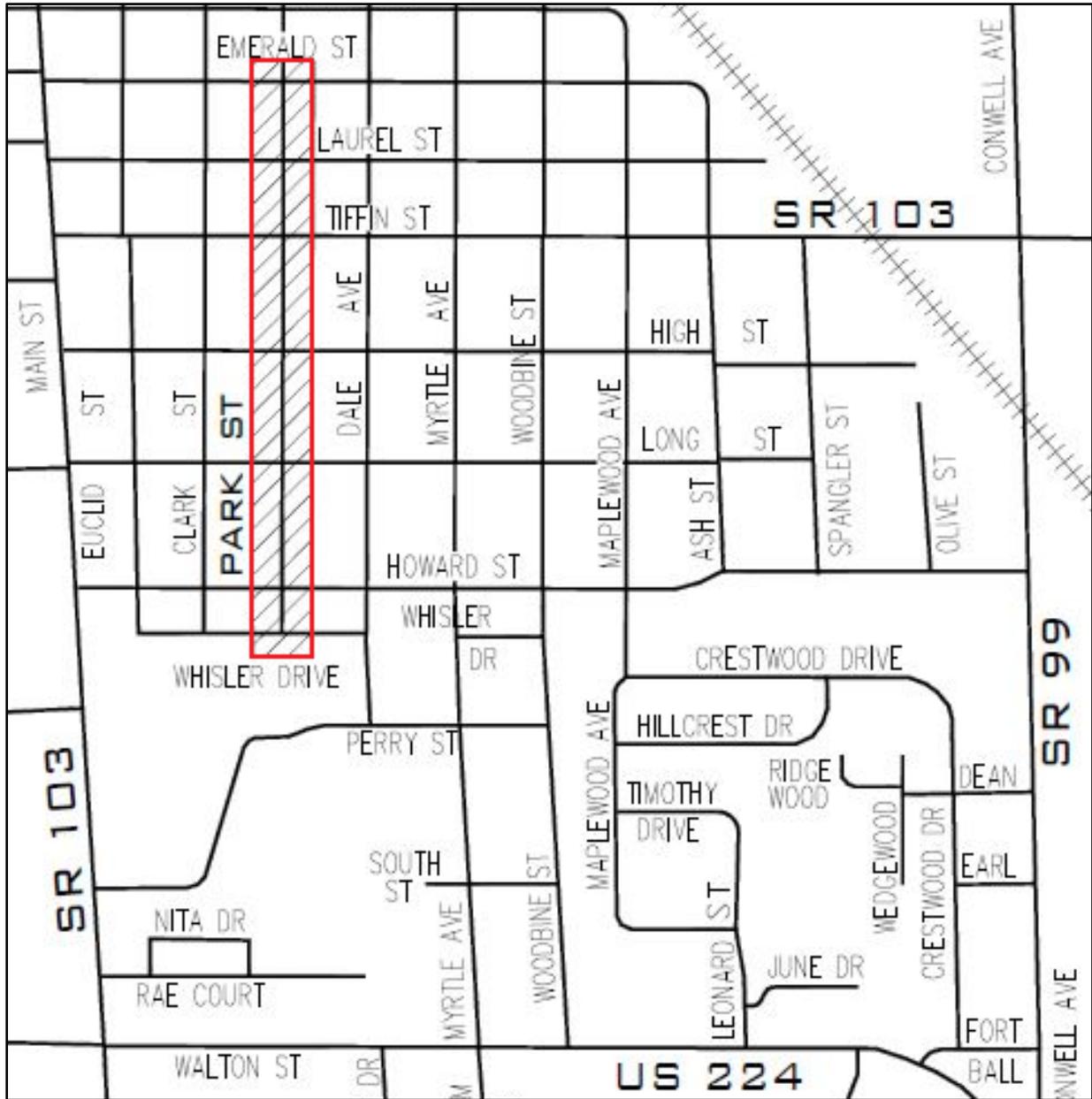


Figure 2. Project location (red)