



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

July 22, 2021

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

**City of Wilmington – Clinton County  
Lead Service Line Replacement Program  
Loan number: FS391003-0015**

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

*Jonathan Bernstein*

Jonathan Bernstein, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

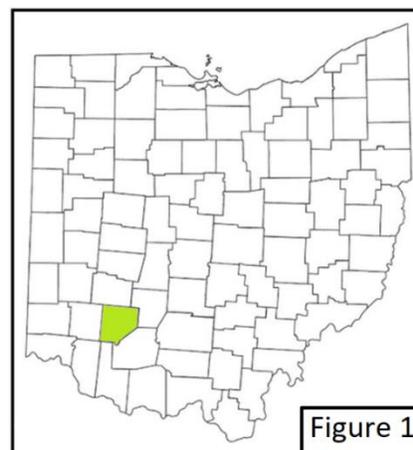
Project: Lead Service Line Replacement Program

Applicant: City of Wilmington  
69 North South Street  
Wilmington, OH 45177

Loan Number: FS391003-0015

### **Project Summary**

The City of Wilmington in Clinton County (see Figure 1) has requested \$101,350 from the Ohio Water Supply Revolving Loan Account (WSRLA) combined with Ohio Public Works Commission (OPWC) funding and city funds, to replace a failing water main and any lead service lines in this section of the water distribution system. This project will replace the Mulberry Street water main and all lead service lines in the public right-of-way and private lead or galvanized steel service lines with copper or polyvinyl chloride (PVC) tubing. Wilmington intends to systematically replace all lead service lines in the water distribution system with non-lead pipe. The WSRLA financing will be principal forgiveness, which means the loan need not be repaid.



### **History & Existing Conditions**

The City of Wilmington sources its water from Caesar Creek Lake, located in Warren, Greene, and Clinton counties and 13 miles away from Wilmington. Their water treatment plant (WTP) is rated to produce four million gallons per day (MGD) of treated surface water, which is distributed through four- to fourteen-inch water lines, and to four water storage towers. Wilmington distributes an average of 1.8 MGD among 5,109 service connections and a to population of 12,403 people.

North Mulberry Street currently has a four-inch cast iron water main that is approximately 100 years old. A recent water main break revealed that corrosion and sediment inside the water main has reduced the effective diameter of the pipe by half and is in need of replacement.

Water service lines, plumbing, and fixtures of older homes often have a higher chance of containing lead. Wilmington intends to reduce lead exposure to customers by eliminating public and private lead and galvanized water service lines. Wilmington is developing a comprehensive map of the location of lead water lines, both public and private, throughout the city. The city public water system will coordinate lead service line replacements to be done in conjunction with water distribution infrastructure projects such as the Mulberry Street water main replacement. There are at least nine

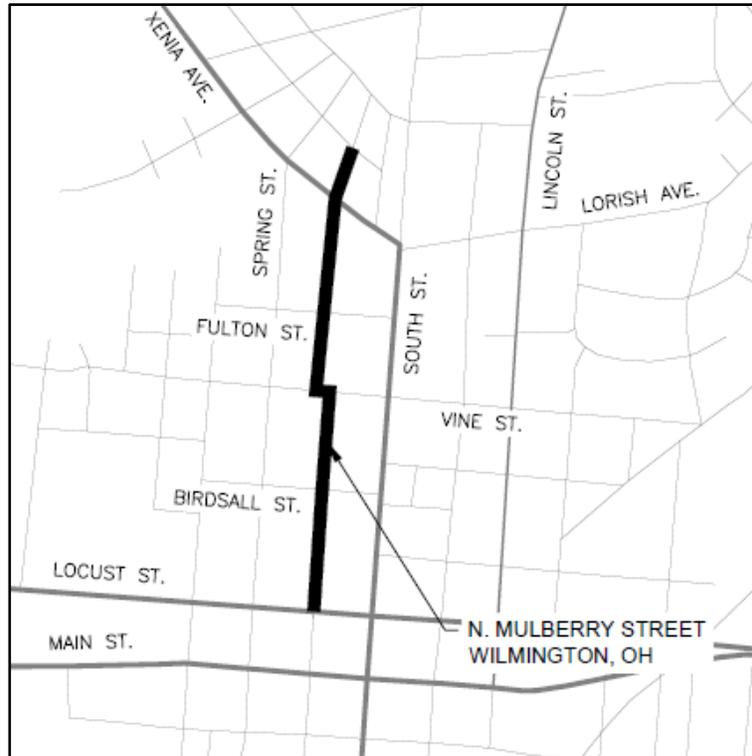
known private lead or galvanized steel service lines among the approximate 80 residences in the Mulberry Street project area, but the majority are unknown.

### **Project Description**

This project is replacing approximately 3,000 linear feet of the old 4-inch cast iron water main on Mulberry Street with a 6-inch PVC water main. The new water main will connect to the existing 12-inch water main at the Locust Street/Mulberry Street intersection to the south, and connect to an existing 6-inch water main on New York Avenue to the north. The north connection will eliminate an existing dead-end water line. Along the alignment, the new Mulberry Street water main will connect with existing water mains on Birdsall, Vine, Xenia, and Fulton streets.

Of the approximate 80 residences on Mulberry Street, nine public lead waterlines and lead or galvanized private home service lines are known to be in the project area, but for many the service line material will be unknown until they are revealed during the water main replacement. If any previously unknown private lead service water lines are discovered when public lead lines are dug and replaced, these will also be replaced with copper service lines. Replacement of the public and private side of the waterlines will be covered by the project funding and at no cost to homeowners. Mulberry Street will be re-paved and sidewalks replaced at the time of the water main replacement project.

Wilmington will obtain permission for the contractor to enter private premises at all reasonable times to replace private lead water line through the City's standard work agreement. No trees will need to be removed for this project. Water will be temporarily shut off during pipe replacement in construction areas.



**Figure 2. Map of project area on Mulberry street, from Locust street to A Street.**



**Figure 3. Map of Wilmington’s known/possible lead water lines marked with yellow dots and non-lead lines marked with green dots**

## **Implementation**

Wilmington is eligible for \$101,350 from the WSRLA in principal forgiveness, which means this amount need not be repaid. Wilmington is using city funds and receiving funding from OPWC to finance the water main and road resurfacing portions of the project. During the 20-year loan period, Wilmington will save approximately \$121,019 by using WSRLA financing, compared to the market rate of 1.79%.

A typical Wilmington residential water customer pays \$36.94 per month. The last water rate increase was 2.25% in January 2021 and rates will increase by 3% in each of the next three years: 2022, 2023, 2024. According to the 2014-2018 American Community Survey, the estimated median household income (MHI) for a resident of Wilmington is \$34,608. The average water utility bill costs amount to \$443/year, which is 1.3% of the MHI and compares favorably to the Ohio average water bill of \$639.

Anticipating loan award in October 2021, construction work will be completed by the early 2022.

## **Public Participation**

The Mulberry Street project was generally discussed during open City Council workshops and meetings during the budgeting process. It has also been part of public presentations concerning the City Capital Improvement schedule. The project has been discussed with Mulberry Street residents by Mayor John Stanforth, who went door-to-door on April 3<sup>rd</sup>. The city website contains a webpage of city projects including the Mulberry project: <https://wilmingtonoh.org/municipal-services/city-projects/>. Earlier this year, a letter about the project went out to affected residents. Another letter, announcing the start of the project, will go out at least 45 days before construction. This letter will include whether it is believed their private-side service line will need replaced and how that process will work. Phone calls and other personal contact will be used to schedule the timing of any work within homes.

Ohio EPA is unaware of any public controversy or opposition to this project, and will make a copy of this document available to the public on its web page: <http://epa.ohio.gov/defa/ofa.aspx#169638770-wsrla-documents-for-review-and-comment> (under the "What's New tab in the "WSRLA Documents Available for Review and Comment list) and distribute it to interested parties upon request. Information supporting the LER is available from the project contact named below.

## **Conclusion**

The proposed water main and lead service line replacement project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing water distribution system, which involves the functional replacement of and improvements to existing waterlines. 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 has no effect on high-value environmental resources** – Construction of water line replacements will be in the street right-of way or in residential tree-lawn, in developed residential areas that lack ecologically valuable environmental resources or habitat. No trees will be cut down to replace the service lines. The Mulberry Street water main alignment will cross under the culverted Lytle Creek

by horizontal directional drilling to avoid disturbance to or negative impacts to the creek. There is one historic building along the project alignment: Fisher Funeral home, at 97 W. Locust Street is confirmed by the city to have copper water service lines and will not be disturbed by the water main and lead service line replacement project. Standard construction best management practices will minimize noise and dust, and traffic disruptions will be temporary with appropriate traffic maintenance measures present. Temporary service interruptions will be conveyed to residents before construction starts.

**Is cost-effective and is not a controversial action** – This project will not specifically increase residential water rates, and the city plans on annual water rate increases of 3% over the next three years. Replacing lead water lines is more cost effective than coating water lines because it permanently removes the possibility of lead leaching into drinking water and the surrounding environment. Ohio EPA is unaware of controversy or opposition to the project.

**Does not create a new, or relocate an existing discharge to surface or ground waters, and 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.** – This project will only be replacing an existing water main and lead and galvanized iron water lines to eliminate a threat to public health. There are no changes to water treatment, sources, or discharge.

The project planning review did not identify any potentially significant short-term or long-term adverse impacts to the quality of the human environment or to sensitive resources (surface waters, coastal zones, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, threatened or endangered species, or state and federal wildlife areas). This project will remove hazardous lead service lines and ensure Wilmington residents have access to safe drinking water.

### **Contact information**

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