



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

September 28, 2020

Limited Environmental Review and Finding of No Significant Impact

**City of Delphos – Van Wert and Allen Counties
Fifth Street Waterline Replacement
Loan number: FS390309-0025**

The attached Limited Environmental Review (LER) is for a drinking water distribution project in Van Wert and Allen counties 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: City of Delphos Fifth Street Waterline Replacement

Applicant: City of Delphos
608 North Canal Street
Delphos, Ohio 45833

Loan Number: FS390309-0025

Project Summary

The City of Delphos has applied for funding from the Ohio Water Supply Revolving Loan Account (WSRLA) for the Fifth Street Waterline Replacement project. The project is intended to reduce water losses within the distribution system by replacing the existing aged and undersized waterlines. The estimated loan amount for this project is \$963,660, with construction scheduled to begin in January 2021 and to be completed in five months.

History & Existing Conditions

The City of Delphos, located in Van Wert and Allen counties, owns and operates the water distribution system that serves its community through approximately 45 miles of 1- to 12-inch water pipe. The city is a surface water sourced treatment plant (WTP), drawing its water from the Auglaize River. The WTP produces an average of 790,750 gallons per day (GPD).

The proposed project is located on Fifth Street, from State Street to Main Street. Delphos's water distribution lines in this area are believed to have been constructed in the 1920s and 1930s, with many of these lines being undersized by today's standards. These lines are subject to multiple and frequent breaks and leakage, requiring water shutoffs, boil advisories, and reduced fire protection, and are therefore well beyond their useful life.

Fifth Street is being reconstructed in 2022 as part of an ODOT project, and Delphos would like to replace the water main in advance of this planned improvement. By replacing this waterline in advance of the ODOT reconstruction, Delphos will be proactive in its capital improvements and will allow for Fifth Street, once the ODOT reconstruction is completed, to be a highlight of the Delphos downtown area.

Delphos is not aware of any large development projects that will require water system improvements, and there are no known petitions circulating in Delphos for water service. The area population of 7,123 is projected to remain stable, and therefore the proposed water main improvements are not expected to have impacts on the existing water demands. Given the low projected growth in demand and the large water supply, Delphos's WTP can provide water to the expected 20-year service population without expanding the infrastructure.

Project Description

The Fifth Street Waterline Replacement project (see Figures 1 and 2) includes the installation of approximately 2,900 linear feet (LF) of 10-inch replacement water mains to replace the existing and aged 6-inch lines. The project will also include the replacement of approximately 1,800 LF of service lines, valves, and hydrants. Work also includes pavement, drives, curbs, and restoration activities. Construction activities will include open cut installation in previously disturbed rights-of-way (streets, sidewalks, driveways, areas of buried utilities, and one directional bore under a small stream) that otherwise support no wetlands, forested areas, or aquatic habitat.

Implementation

The total estimated loan amount for this project is \$963,660. Delphos proposes to borrow the entire project amount from the WSRLA. The project service area qualifies for the Disadvantaged Community, 30-year, zero percent WSRLA interest rate. Borrowing at zero percent will save Delphos approximately \$284,000 over the life of the loan compared to the current market rate of 1.78 percent.

Debt for this water distribution project will be repaid from monthly water fees and city water improvement fund monies without rate increases related to this project. The local median household income is \$45,962. Under the water rates that are effective in 2020, and based on average water usage, the average residential water bill is \$45.03 per month, or \$540.36 per year. This represents 1.18 percent of the MHI, which compares favorably to the statewide average of 1.2 percent and is considered affordable.

Public Participation

Delphos will notify affected residents and businesses of the project prior to construction. In addition, Delphos has discussed the project at board meetings that were open to the public. Furthermore, this Limited Environmental Review will be posted on Ohio EPA's and Delphos's websites. Given the limited potential environmental impact of the project and the lack of a rate increase or property assessments, this is considered adequate public participation.

Conclusion

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

- **will have no significant adverse environmental effect**, since sensitive resources such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, or threatened or endangered species are not present in the project area.
- **does not require extensive specific impact mitigation**, as the proposed project involves the replacement of existing water distribution lines located in road rights-of-way where the roads will be restored to their pre-project grade and condition.
- **will have no adverse effect on high value environmental resources**, as the project area includes a developed residential and commercial area, with asphalt roads and numerous existing utilities, so no high value environmental resources are present there.

- **is not a controversial action**, as user rates will not be increased as a result of this project, adverse impacts to environmental resources are unlikely to occur, and Ohio EPA is unaware of any public opposition to the project.
- **is cost-effective**, as replacement of the water distribution lines will help to minimize water losses and ensure continuous potable drinking water supply to residents and businesses located in the project area at a reasonable cost.
- **does not involve a new or relocated discharge to surface or ground water, involve any increase in volume of discharge or loading of pollutants from an existing source or new facilities, create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from existing sources; or provide capacity to serve a design population substantially greater (thirty percent) than the current design population**, as no discharge points or pollutant loading will be part of the project. The project does not require the expansion of Delphos's water treatment facility beyond its current capacity or require the addition of a supplementary water supplier, so it will not require a change in water withdrawal. Little population change is anticipated during the 20-year planning period.

The planning activities for the project have identified no potentially significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources. Implementation of appropriate construction mitigation measures is required by the contract specifications and construction activity will be limited to the existing, previously disturbed road rights-of-way. The project will benefit the project service area by replacing aged water service structures and will help reduce water system costs by minimizing/eliminating water loss.

Contact info

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Figure 1: Project general area, in red



Figure 2: Specific project area