



Mike DeWine, Governor
Jon Husted, Lt. Governor
Anne M. Vogel, Director

April 5, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Kenton – Hardin County
Scott Avenue Water Line and Lead Service Line Replacement Project
Loan number: FS390487-0030**

The attached Limited Environmental Review (LER) is for a water distribution system project in Kenton 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,

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Scott Avenue Water Line and Lead Service Line [LSL] Replacement

Applicant: City of Kenton
111 West Franklin Street
Kenton, Ohio 41234

Loan Number: FS390487-0030

Project Summary

The City of Kenton in Hardin County has requested approximately \$445,600 in financial assistance from Ohio EPA's Water Supply Revolving Loan Account (WSRLA) program to replace water lines in and along Scott Avenue between West Grove Street and West North Street and along West North Street between Westview Estates and Kuert Avenue. As well as the water lines in these locations, the city is proposing to replace lead service lines in prior-disturbed locations within the project area shown in Figure 1. Additional work consists of restoring city streets and other proposed areas.

In terms of potential direct and cumulative environmental impacts, Ohio EPA has reviewed the city's proposed project and determined there will be no significant adverse environmental impacts, as discussed in the conclusion. Most importantly, the proposed project has been designed to avoid, minimize, or mitigate impacts sensitive resources within the project area.

The city estimates that its water line and LSL replacement project will require about eight months to complete. Its most recent water rate increase of 3% was adopted in 2022.

History & Existing Conditions

The city's existing four-inch diameter cast iron Scott Avenue water main is undersized and past its useful life. For that reason, it needs replacement with a larger, eight-inch diameter water line. Moreover, Kenton's Scott Avenue project will address such problems as inadequate (low) water pressure and reliability, water loss from the distribution system, and water line breaks resulting from the age and material of the existing water mains.

The existing service lines are lead and will be replaced to each dwelling.

Project Description

The project entails replacement of cast iron main and lead service lines along Scott Avenue between West Grove Street and West North Street and replacement of water lines along West North Street between Westview Estates and Kuert Avenue. This project consists of installing 1,650 linear feet of new 8-inch diameter water main along West North Street and Scott Avenue. In addition, sixteen lead service lines to houses will be replaced with $\frac{3}{4}$ -inch copper lines. Figure 1 below shows the project area, while Figure 2 illustrates a typical installation of copper replacement lines.



Figure 1. Aerial photo of project area

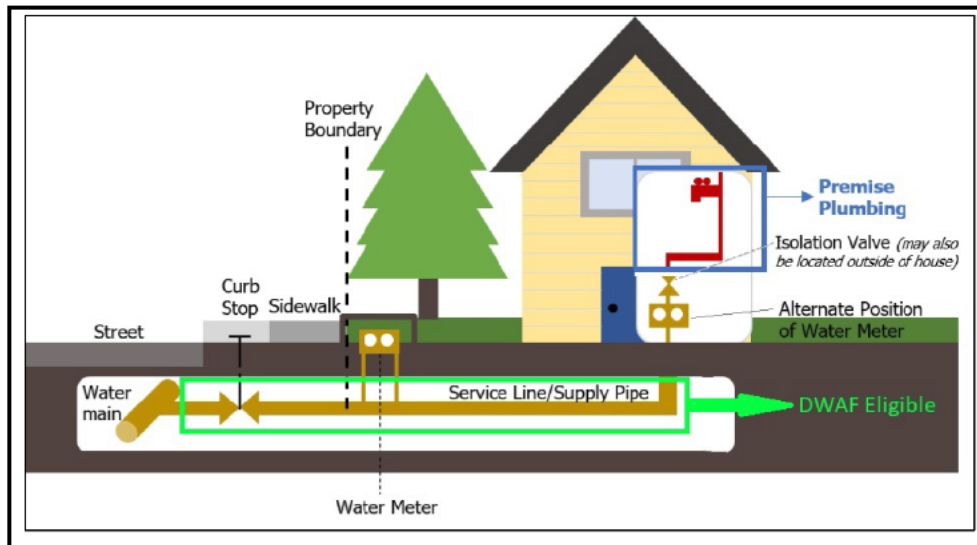


Figure 2. General illustration of typical lead service line replacement

Implementation

To construct the proposed project described above, the City of Kenton intends to finance the improvements to its water system through an Ohio EPA Water Supply Revolving Loan Account (WSRLA) loan. Under the WSRLA program, the city is eligible to receive 53% of the lead service line costs as principal forgiveness. The city will get the balance at a 0% interest rate. Utilizing this funding will allow the city to keep its water rates and fees where they are currently. Under the previously established water rates in effect in February 2023, a typical, in-city residential customer using on average 425.5 cubic feet of water per month is currently paying a fee of \$33.90 per month, or about \$407 a year. When expressed as a percentage of the city's latest median household income (MHI) figure of \$40,669, this annual fee is about 1% of the city's MHI.

Further water rate increases are expected in 2024 through 2025 to pay for future water infrastructure projects. After that, the city may need annual rate increases of 3% to pay for related maintenance costs, subject to council review and approval. Kenton will receive the small-community rate of 2.18% on a 30-year loan; Ohio EPA expects that the village will save about \$157,855 when compared to a market-rate loan of 3.98%. WSRLA interest rates are set monthly and may change for a later loan award.

By proposing to fund their project in this way, Ohio EPA anticipates that Kenton should be able to generate enough revenue under its current and proposed rate structure to continue to own, operate, and maintain its water distribution and treatment systems well into the future.

If the city's loan is awarded in May 2023, Ohio EPA expects that the city's contractor will commence construction soon thereafter and complete work in eight months.

Public Participation

The city has held several public meetings to date, which were covered in the local newspaper. The most recent was held on February 28, 2023. According to Kenton, these were held at the County Courthouse and the city advertised the meetings in the local paper and on their social media site.

Ohio EPA will make a copy of this document available to the public on its announcements web page (<https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>) and will provide it upon request. A copy may also be posted at the city's main building and on its web site (if available).

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public water distribution system, which involves the functional replacement of and improvements to existing mechanical equipment. 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 have no effect on high environmental resources because all the proposed work will be in road rights-of-way and other prior-disturbed locations such as residential yards.

Is cost effective and a non-controversial action. In comparison to the no-action and other available options considered during project planning, the chosen improvements were selected by the

city as more cost effective on the basis of costs and non-monetary factors. Moreover, the proposed improvements constituting this project are non-controversial because they will not adversely impact the environment, or the residential rates paid for Kenton's public water.

Does not create a new, or relocate an existing discharge to surface or ground waters, and will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters because the city's proposed project only entails making water system improvements in prior-disturbed areas without significantly increasing the amount of water available to city residents. Similarly, the city's lead service line replacement project will have no significant effect on water use or the discharge of water pollutants.

Will not provide capacity to serve a population substantially greater than the existing population because the proposed replacement water mains and service lines to residential homes will be minimally sized to provide for current needs.

To conclude, the city's proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. The planning activities for the proposed project identified no potentially significant, direct, indirect, or cumulative adverse impacts. The proposed project is expected to have no short- or long-term adverse impacts on the quality of the human environment or on sensitive resources such as air quality, aquatic and terrestrial habitat, coastal areas, archaeologically or historically significant sites, coastal areas, farmland, floodplains, ground water, public safety, wetlands, wild and scenic rivers, or threatened or endangered species. The City of Kenton's proposed project will enable it to address its responsibilities under the Safe Drinking Water Act. Public health risks associated with potential exposure to lead in the city's distribution system in the project area are also expected to be reduced.

Contact information

Kevin Hinkle
Ohio EPA, Division of Environmental and Financial Assistance
Office of Financial Assistance, Technical Review Section, Environmental Planning Unit
P.O. Box 1049
Columbus, Ohio 43216-1049

e-mail: kevin.hinkle@epa.ohio.gov