



**April 30, 2024**

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

**City of Defiance – Defiance County  
Jefferson Avenue Water Line Replacement  
Loan number: FS390305-0047**

The attached Limited Environmental Review (LER) is for a water line replacement project in Defiance 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

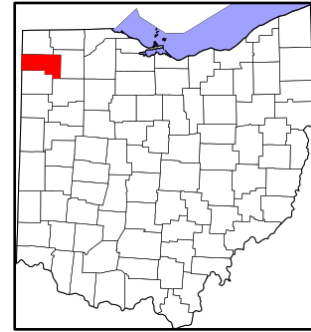
## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Project: Jefferson Avenue Water Line Replacement

Applicant: City of Defiance  
631 Perry Street  
Defiance, Ohio 43512

Loan Number: FS390305-0047



**Figure 1. Defiance County**

### **Project Summary**

The City of Defiance, in Defiance County (Figure 1), has requested \$2,280,907 from the Ohio Water Supply Revolving Loan Account (WSRLA) to finance the Jefferson Avenue Water Line Replacement project. This project is part of a larger plan to improve drinking water infrastructure in Defiance.

### **History & Existing Conditions**

The Defiance Water Treatment Plant (WTP) draws water from the Maumee River to replenish its 74-acre upground reservoir for its supply source. Depending on the rate of flow through the plant, the treatment process can take from 12 to 25 hours. The system processes an average daily flow of 3.8 million gallons per day (MGD) of drinking water for Defiance, as well as Brunersburg, Ayersville, and Christi Meadows. The plant is capable of treating 8.0 MGD.

The distribution system consists of over 152 miles of water lines ranging in size from 2 inches to 16 inches (majority being 6 inches). There are two elevated water towers with a combined capacity of 2 million gallons, and approximately 1,050 fire hydrants.

Defiance is reliant on aging and undersized mains in portions of the system. Defiance has several water main replacement projects planned as an opportunity to upsize or downsize the mains to better optimize system hydraulics, water quality, and potentially reduce costs of required maintenance. The existing 6-inch cast iron water line on Jefferson Avenue is past its useful life and was recommended for replacement after being evaluated as part of the City's 2019 Water Distribution Modeling.

### **Project Description**

This project includes the replacement of the water line on Jefferson Avenue from Downs Street to East Second Street. Approximately 5,500 linear feet (LF) of 6-inch main will be replaced along Jefferson Avenue (Figure 2).

Additional work includes the replacement of fire hydrants, installation of main line valves, service line transfers, pavement, sidewalk and site restoration, and replacement of a section of drainage.

Water service will be temporarily shut off during replacement. Surfaces disturbed during construction (e.g. paved roads, driveways, lawn strips and lawns, etc.) will be restored upon completion of service line replacements.

### **Implementation**

Defiance proposes to borrow \$2,280,907 from the Ohio WSRLA at the standard rate of 2.6 percent (interest rates are set monthly and may change for a later loan award) to cover the cost of this construction project. During the 20-year loan period, Defiance will save approximately \$351,921 by using WSRLA dollars at this rate, compared to the current market rate of 3.85 percent.

The debt associated with this project will be recovered from monthly user charges. Under the current ordinance, water rates are scheduled to increase by 1.9 percent in 2025. No rate increases will occur due to this project. Defiance reports that the expected average annual residential water bill will be \$536.40 upon project completion. This represents 1 percent of the median household income for Defiance (MHI; \$58,015) and is greater than the Ohio average annual water bill of \$477.

Construction is anticipated to begin following loan award and will be complete by 2025.

### **Public Participation**

The water line replacement project has been discussed during Defiance city council meetings where the public is welcome to attend. Council meetings are held the first, second, and fourth Tuesday of every month. The city's website allows for review of council meeting minutes and legislation. Meetings are also broadcasted live on the city's YouTube channel.

Defiance will send out a 60-day advance notice to owners of all properties on the project list as initial notice of the program and include information about temporary water shutoffs to prepare for work on private property.

Ohio EPA is unaware of significant 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/divisions-and-offices/environmental-financial-assistance/announcements>

### **Conclusion**

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public water system (PWS) which involves the replacement of water lines. 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.** Construction will take place in existing rights-of-way and lawns in developed residential locations that lack important environmental resources. Standard construction best management practices will minimize noise, dust, erosion, sediment, and traffic disruptions. Temporary water service interruptions will be communicated to affected customers.

**Is cost effective and not a controversial action.** The proposed project involves the most cost-effective method to complete necessary replacements of aged water lines, as well as upsizing necessary mains to optimize system hydraulics. This project will have no impact on residential water rates.

**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 capacity to serve a population substantially greater than the existing population.** This phase of infrastructure improvements will have no impact on Defiance's PWS (e.g., withdrawal, treatment, storage, distribution, usage, etc.) The project involves replacing existing water lines in Defiance and does not impact capacity.

The planning activities for the project have identified no potentially significant adverse impacts. The project is expected to have no 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 improving the safety and efficiency of Defiance's PWS, benefiting Defiance residents.

### **Contact Information**

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**Figure 2. Water line replacement project area along Jefferson Avenue**