



January 31, 2025

Limited Environmental Review and Finding of No Significant Impact

**City of Cleveland – Cuyahoga County
Highland/Trebisky Transmission Main Renewal Phase 2
Loan number: FS390262-0055**

The attached Limited Environmental Review (LER) is for a water distribution repair project in Cuyahoga County which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Supply Revolving Loan Account (WSRLA) below-market interest rate revolving loan program. The LER describes the project, costs, and expected environmental benefits. Making available this LER fulfills the 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 program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. In accordance with Ohio Administrative Code 3745-150-05, this project meets the criteria for an LER rather than the more comprehensive Environmental Assessment. More information can be obtained by contacting the person named at the end of the attached LER.

Upon issuance of this Final 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

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Highland/Trebisky Transmission Main Renewal Phase 2

Applicant: City of Cleveland
1201 Lakeside Avenue
Cleveland, Ohio 44114

Loan Number: FS390262-0055

Project Summary

The City of Cleveland has requested funding from the Ohio Water Supply Revolving Loan Account (WSRLA) for a drinking water project to repair aged water distribution lines that are prone to failure in Cleveland's water distribution system. The estimated loan amount for the project is \$7,565,244, with construction scheduled to begin spring 2025 and last approximately 12 months.

History & Existing Conditions

Cleveland's water system dates back to 1856, when the original water treatment system was put into operation. Since that time, the system has been expanded and renovated many times to meet the needs of its growing population and industry. The City of Cleveland Division of Water (CWD) is the largest drinking water provider in northeast Ohio, serving over one million people in 70 communities over a service area covering more than 640 square miles. CWD drinking water is sourced from Lake Erie and distributed through more than 5,300 miles of water mains. The CWD system includes four water treatment plants (WTPs), as well as various reservoirs, elevated and ground level storage tanks, pumping stations, valves, and hydrants.

The proposed water transmission improvement project is located in the southern portion of the CWD service area, in the cities of Richmond Heights and South Euclid, and addresses approximately 5,000 linear feet (LF) of existing 42- and 48-inch diameter prestressed concrete cylinder pipe (PCCP) transmission main. This main directly affects approximately 36,828 residential connections and 986 commercial connections. Also, because the main transmits water from the Nottingham WTP to additional pumping facilities, it indirectly affects 102,242 residential connections and 5,538 commercial connections. These aged transmission lines experience a high number of breaks which disrupt service. These breaks have included seven catastrophic failures, which required costly emergency repairs, boil alerts, and have caused basement flooding.

Existing demand is approximately 50 million gallons per day (MGD) for all categories, and it is expected to drop slightly over the 20-year planning period. Additionally, CWD has experienced a gradual reduction in volume of water pumped every year due to improved efficiency of water fixtures

and efforts to reduce consumption and water loss. Given the low projected growth in demand and the large water supply, CWD can provide water to the expected 20-year service population without expanding the infrastructure.

Project Description

The proposed project will include steel slip lining and limited open cut replacement of approximately 5,000 LF of aged 42- and 48-inch diameter transmission pipes along Trebisky Road, from Highland Road to Monticello Boulevard. The project will include open-cut construction in previously disturbed rights-of-way (streets, driveways, and areas of buried utilities) that otherwise support no wetlands, forested areas, or aquatic habitat. The project will improve system resiliency by eliminating water line breaks, which interrupt service, cause flooding, and result in water losses and emergency repairs.

Implementation

The estimated loan amount for this project is \$7,565,244, and Cleveland proposes to borrow the entire project amount from the WSRLA. Cleveland qualifies for the standard long-term WSRLA below-market interest rate on 20-year loans, which in February is 2.81% (WSRLA loan interest rates are set monthly, and the rate may change for a later loan award). Borrowing at 2.81% will save Cleveland approximately \$1,180,000 over the life of the loan compared to the current market rate of 4.06%.

Cleveland will recover debt associated with the project with revenue generated by monthly user charges, and water rates will not increase specifically for this project. The average annual residential water bill in this service area is \$323, as compared to the state average of \$477.

Public Participation

The project has been discussed in open council meetings and utility meetings. Once a contractor has been awarded the contract, a public meeting will be held by Cleveland online, and affected property owners will receive letters from the city regarding construction approximately 45 days prior to the beginning of construction. The project has also been reviewed and approved by the cities of Richmond Heights and South Euclid, and these cities will hold public meetings prior to construction. The contractor will send notification letters to affected property owners prior to the beginning of construction, CWD will have a 24/7 emergency call number for construction information, and full-time, on-site construction inspectors and managers will be available during construction.

Ohio EPA is unaware of controversy about or opposition to these projects and the Limited Environmental Review and Finding of No Significant Impact will be provided to the City of Cleveland for public distribution and information and posted on the Ohio EPA Division of Environmental and Financial Assistance website.

Conclusion

The proposed project meets the 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 structures. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will require no specific impact mitigation, as 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, and as the project involves the repair and replacement of water distribution lines in road rights-of-way where the roads and rights-of-way will be restored to their pre-project grade and condition.

Will have no effect on high-value environmental resources, as the project area includes road rights-of-way adjacent to residential lots, with asphalt roads and some existing utilities, where no high-value environmental resources are present.

Is cost effective, as the only other option is full replacement of the existing water lines, which would be a more expensive and disruptive construction alternative.

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.

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, or substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters, as no discharge points or pollutant loading will be part of the project. The project does not require the expansion of Cleveland's water treatment facilities beyond current capacity or require the addition of a supplementary water supplier, so it will not require a change in water withdrawal.

Will not provide capacity to serve a population substantially greater than the existing population, as the project scope is limited to repairing and replacing existing water lines to reduce water line breaks and water losses. Little population change is anticipated during the 20-year planning period.

Based upon Ohio EPA's review of the planning information and the materials presented in this Limited Environmental Review, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to the environmental features discussed previously. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts will be temporary and mitigated. The project will result in improvements to the water distribution system by eliminating water line breaks, which interrupt service, cause flooding, and result in water losses and emergency repairs.

Contact Information

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Figure 1. General project area

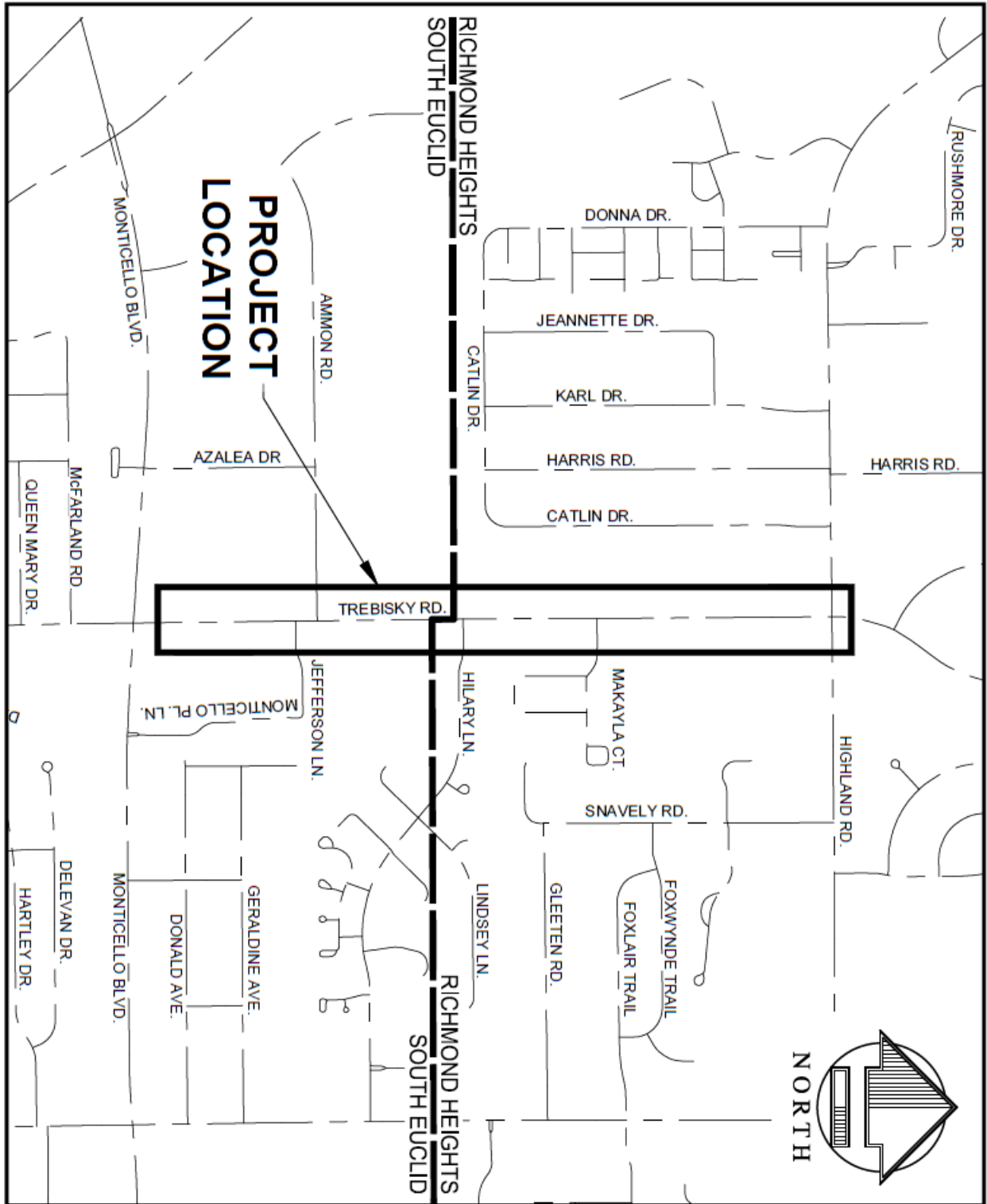


Figure 2. Project area