



January 30, 2025

Limited Environmental Review and Finding of No Significant Impact

**City of Cleveland – Cuyahoga County
CWD LSLR Year 3 Projects**

Loan numbers:

FS390262-0058

FS390262-0069

FS390262-0071

FS390262-0072

FS390262-0073

FS390262-0074

FS390262-0075

FS390262-0076

FS390262-0077

FS390262-0059

FS390262-0060

FS390262-0062

FS390262-0063

FS390262-0064

FS390262-0065

FS390262-0066

FS390262-0067

FS390262-0068

FS390262-0070

The attached Limited Environmental Review (LER) is for drinking water projects in the Cleveland Water Department distribution system 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 projects, 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 projects should not result in significant adverse environmental impacts. In accordance with Ohio Administrative Code 3745-150-05, these projects meet 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 projects have changed significantly.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Projects:

Loan Numbers:

CWD LSLR Year 3-1	FS390262-0058
CWD LSLR Year 3-2	FS390262-0069
CWD LSLR Year 3-3	FS390262-0071
CWD LSLR Year 3-4	FS390262-0072
CWD LSLR Year 3-5	FS390262-0073
CWD LSLR Year 3-6	FS390262-0074
CWD LSLR Year 3-7	FS390262-0075
CWD LSLR Year 3-8	FS390262-0076
CWD LSLR Year 3-9	FS390262-0077
CWD LSLR Year 3-10	FS390262-0059
CWD LSLR Year 3-11 SC-1 CA Reimbursement	FS390262-0060
CWD LSLR Year 3-13 SC-3 Customer LSLR Focus	FS390262-0062
CWD LSLR Year 3-14 SC-4 Extra Work	FS390262-0063
CWD LSLR Year 3-15 Supplies – Filters 1 Small	FS390262-0064
CWD LSLR Year 3-16 Supplies – Filters 2 Large	FS390262-0065
CWD LSLR Year 3-17 Supplies – Curb Boxes and Bases 1	FS390262-0066
CWD LSLR Year 3-18 Supplies – Curb Boxes and Bases 2	FS390262-0067
CWD LSLR Year 3-19 Supplies – Copper and Brass 1	FS390262-0068
CWD LSLR Year 3-20 Supplies – Copper and Brass 2	FS390262-0070

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

Project Summary

The City of Cleveland has requested funding from the Ohio Water Supply Revolving Loan Account (WSRLA) for several lead service line replacement (LSLR) projects to replace lead service lines (LSL) in Cleveland's water distribution system. A portion of the WSRLA financing will be in the form of principal forgiveness, a loan that does not need to be repaid. Due to the nature of the projects, environmental impacts will be minimal. Construction is scheduled to begin spring 2025 and last approximately 12 months.

History & Existing Conditions

In the Cleveland Water Department (CWD) system, lead was allowed to be used for service connections installed from 1856 to 1953, for connections that were one inch in diameter or smaller. In CWD's system, lead was never known to be used for connections larger than one inch due to lead's

weight and pipe production methods. CWD banned the use of lead for new water service connection installation beginning in 1954. For these reasons, CWD assumes that city-owned service lines installed before 1954 that are one inch in diameter or smaller are likely made of lead unless records exist of that individual service being replaced. Similarly, service lines installed in 1954 and more recently, regardless of size, should not be lead, and customer-owned galvanized steel services connected to city-owned services installed in 1954 were never downstream of lead. CWD's customer-owned service line material knowledge, like virtually all water systems, is poor. Based on the past five years of connection inspections, CWD knows that copper was used for customer-owned connections one inch and smaller in diameter about 90% of the time. With the city-owned service line material knowledge alone, CWD has achieved about an 80% accuracy on finding lead.

CWD updates its service line tracking system daily with information on replacement work that takes place. As of January 2024, CWD had approximately 176,000 city-owned LSLs and 194,000 customer owned LSLs. Based on past connection inspections, CWD estimates that about 20% of the city-owned connections listed as "lead" in their system of record are actually copper due to past service line replacements that are not yet reflected in their inventory. Additionally, approximately 209,000 customer-owned connections are one inch in diameter or smaller in size, installed prior to 1954, and made from unknown material, which means they could be lead or galvanized steel that is, was, or could have once been downstream of a lead service line and require replacement. Based on past connection inspection records, CWD estimates that about or 10% of the unknown customer-owned connections will be lead or otherwise requiring replacement. CWD estimates that 95% of customer-owned lead connections or connections otherwise requiring replacement will be attached to an existing city-owned lead service. Based on these estimates, CWD must remove at least 4,000 of these connections per year to achieve a 30-year elimination of all LSLs system wide.

For years 1 and 2 of the LSLR program, CWD nominated projects to replace approximately 4,100 connections per year. For Year 3, CWD nominated projects to investigate service line material at more than 10,000 locations, which will result in approximately 8,700 city-owned LSLs, 1,600 customer-owned LSLs, and 1,500 connections confirmed as copper. Contractor capacity and materials for this work may be limited to fulfill the projects' full scope. CWD's Year 3 project aims to replace approximately 9,000 LSLs.

Project Description

The proposed LSLR projects will replace lead service lines in CWD's distribution system, with work taking place on both the public and private sides of the water service. These projects are part of a 30-year plan to eliminate all LSLs in the CWD direct service distribution area. CWD's goal for LSLR is to remove the largest amount of lead for the largest number of people for the lowest cost as efficiently as possible. This includes removing lead where it is known to exist (i.e., customer-owned lead service lines), and continuing to remove lead at locations serving the most vulnerable populations. These locations include childcare facilities, schools, and homes where lead paint issues have been remediated. Collectively, an estimated 9,000 city- and customer-owned LSLs will be removed.

LSLR work will take place primarily in the right-of-way, at the curb stop, and, if a private lead service line exists, at the point of entry into the home. Most of the lines will be replaced by pulling the new copper pipe through the ground as the existing line is removed using a mole excavation tool.

Therefore, impacts should be minimized. Dust, noise, traffic disruptions, and erosion or sediment run off will be minimal. Work for the projects will be restricted to 7:00 am to 6:00 pm, with exceptions to special case facilities (e.g., childcare centers, schools, etc.). The city will also arrange for traffic safety measures, erosion control measures, restoration of all areas, and spoil disposal. Water will be temporarily shut off during pipe replacement and communicated to property owners.

Implementation

Cleveland has requested WSRLA principal forgiveness for these LSLR projects and is eligible to receive up to 53 percent principal forgiveness to fund these projects. Cleveland proposes to borrow the remaining balance for the LSLR projects in the form of 20-year loans from the WSRLA to fund these projects, and is eligible for zero percent hardship loans, as opposed to the current market rate (February 2025) of 4.68%.

The average annual residential water bill in Cleveland is \$334, as compared to the state average of \$477. These LSLR projects will not impact water bills.

Public Participation

The projects have been discussed in open council meetings and utility meetings. CWD has communicated with affected residents through door hangers, has a website containing detailed instructions for impacted homeowners, and a “Lead Inquiry Line” to contact CWD for additional information. Individual property owners will be contacted by mail and email, when available, before work is to start.

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 public water distribution system, which involves the functional replacement of and improvements to existing equipment. 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 construction will be done in the existing rights-of-way, and lawns in developed residential locations. Due to the nature of the work to replace private lead service lines using an excavation tool, any impacts will be minimal to non-existent. Little to no tree removal is expected to take place as part of these projects. Temporary water service interruptions will be communicated to affected customers.

Will have no effect on high-value environmental resources as construction will be done in the existing rights-of-way, and lawns in developed residential locations that lack important environmental resources.

Is cost effective as there is no feasible alternative to replacing lead service lines.

Is not a controversial action as these projects will have no impact on residential water rates. Cleveland and Ohio EPA are unaware of controversy about or opposition to these projects.

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 the projects will improve existing infrastructure and eliminate a threat to public health and have no effect on water withdrawal, treatment, discharge, or water source.

Will not provide capacity to serve a population substantially greater than the existing population as the projects involve replacing existing lead service lines in CWD service areas and do not impact capacity.

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. Furthermore, the projects will eliminate lead material from drinking water lines at a reasonable cost, which will reduce public health threats.

Contact Information

R. Eric Schultz
Division of Environmental & Financial Assistance
Ohio Environmental Protection Agency
PO Box 1049
Columbus, Ohio 43216-1049

Phone: (614) 644-3713
Email: eric.schultz@epa.ohio.gov

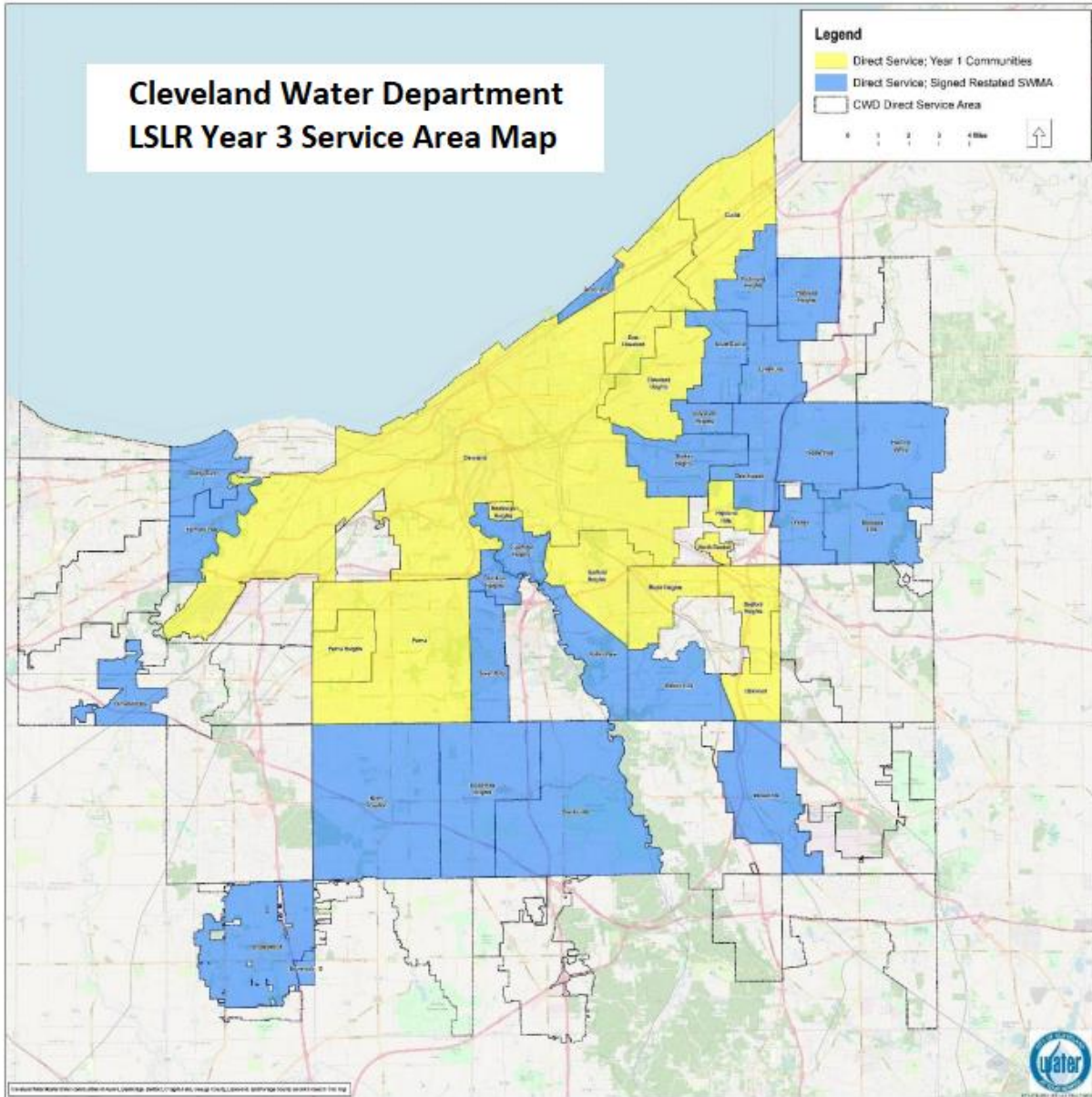


Figure 1. General project area