



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

October 22, 2021

Limited Environmental Review and Finding of No Significant Impact

**City of Cleveland – Cuyahoga County
Lead Service Line Replacement 2022
Loan number: FS390262-0032**

The attached Limited Environmental Review (LER) is for a water distribution project in Cuyahoga County 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 Name: Lead Service Line Replacement 2022

Applicant: City of Cleveland
Division of Water
1201 Lakeside Ave.
Cleveland, OH 44114

Loan Number: FS390262-0032

Project Summary

The City of Cleveland in Cuyahoga County has requested \$1,000,000 from the Ohio Water Supply Revolving Loan Account (WSRLA) for the Lead Service Line Replacement 2022 project as the first phase to replace public lead service lines in the Cleveland water distribution system. The replacements will occur initially at childcare facilities. 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 project, environmental impacts will be minimal. The project will protect human health by eliminating lead drinking water lines.

History & Existing Conditions

The City of Cleveland, Division of Water (Cleveland Water) provides water to 80 communities in five counties from four surface water treatment plants that draw from Lake Erie. The distribution system includes 5,300 miles of water lines.

There are approximately 110,000 public lead service lines in Cleveland (see Figure 1). Based on water line replacement experience, Cleveland Water has found only about seven percent of private lines to be lead. Cleveland Water's policy is to remove any lead lines that are discovered during public water line replacement. Additionally, leaking public water service lines are replaced with copper, and if the private line is found to be lead, it is replaced at no cost to the homeowner.

Cleveland Water collaborated with Ohio EPA, Ohio Department of Health (ODH), Ohio Department of Jobs and Family Services (ODJFS), and Ohio Department of Education (ODE) to target and eliminate lead service lines and high lead-content faucets/fixtures in childcare settings. Based upon the list of ODJFS childcare facilities, Cleveland Water anticipates replacing city-owned lead service lines at 450 childcare facilities with this and future phases.

Project Description

This project includes checking for public and private lead lines at childcare facilities in Cleveland. Replacement of the public and private lead service lines will be carried out by a contractor. For this project, city funds will cover the replacement cost of private lead service lines. The contractor will be responsible for restoration of the work site, such as paving and lawn planting.

Cleveland will obtain permission for the contractor to enter private property to replace the private pipe through the city's standard work agreement. Water will be temporarily shut off during pipe replacement if ODJFS rules permit it for that facility during hours of operation. If ODJFS rules do not permit it, Cleveland and the contractor will either conduct the work after daycare hours of operation or will provide a temporary potable water connection to a hydrant or other common means.

The lead service line 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.

Each public service line replacement will cost approximately \$4,000. The private lead service line replacement cost is highly variable depending on site conditions and will be paid by Cleveland Water funds.

The goal is to eliminate lead lines from all licensed daycare facilities, which may involve future WSRLA loans. As long as the lead service line replacement funding continues to be available, Cleveland Water will continue to seek funding of work, expanding into other counties within the Cleveland Water distribution area. The work in other counties will begin with daycares with lead service lines. Once all daycares interested in participating with the program are lead-free, Cleveland Water will extend the program to residential customers.

Implementation

Cleveland requested \$1,000,000 from the WSRLA in the form of a principal forgiveness loan, which will not need to be repaid. During the standard 20-year loan period, Cleveland will save \$1,207,841 by using WSRLA principal forgiveness funding, compared to the current market rate (June 2021) of 1.91%. Potential future WSRLA principal forgiveness loans would yield similar savings.

The average annual residential water bill in Cleveland is \$296, which is 1% of local median household income (MHI; \$29,008) and compares favorably to the Ohio average bill, \$639. The lead service line replacement project will not impact water bills.

WSRLA funding will be used for public lead service line replacements. Any private lead service lines will be paid for by Cleveland Water. Construction will begin after WSRLA loan award autumn of 2021 and be completed by December 2023.

Public Participation

Cleveland Water has communicated with affected residents through door hangers and a website containing detailed instructions for impacted homeowners (<http://www.clevelandwater.com/lead-awareness>). Additionally, each of the daycare properties has been contacted via one postcard and two letters, requesting confirmation of interest in the program. Individual property owners will be contacted before work is to start.

Ohio EPA is unaware of the controversy about or opposition to this project and will make a copy of this document available to the public on its web page (<http://epa.ohio.gov/defa/ofa.aspx> under the "What's New" tab in the "WSRLA Documents Available for Review and Comment" list) and will provide it upon request.

Conclusion

The proposed lead service line replacement is a water system infrastructure improvement that qualifies for a Limited Environmental Review (LER) and meets the following additional criteria for an LER:

Will have no significant environmental effect, does not require extensive specific impact mitigation, and will have no effect on high-value environmental resources. Construction will be done in the existing right-of-way and in lawns in developed residential locations that lack important environmental resources. Due to the nature of the work to replace lead service lines any impacts will be minimal. Temporary water service interruptions will be communicated to affected customers. Appropriate traffic safety controls will be used.

Is cost-effective and not controversial. The project is more cost-effective than internally coating the lines with epoxy because it has the additional benefits of eliminating the lead pipe and potential for lead leaching into drinking water. This project will have no impact on residential water rates.

Ohio EPA is unaware of controversy about or opposition to this 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, 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. The project will merely improve existing infrastructure, 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. The project is restricted to existing homes and buildings that have lead service lines.

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 (surface waters, coastal zones, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, threatened or endangered species, or state and federal wildlife areas). Applicable construction impact mitigation measures and practices will be followed on all lead service line replacements. Many daycare facilities and private homes will benefit from the removal of potentially harmful lead service lines.

Contact information

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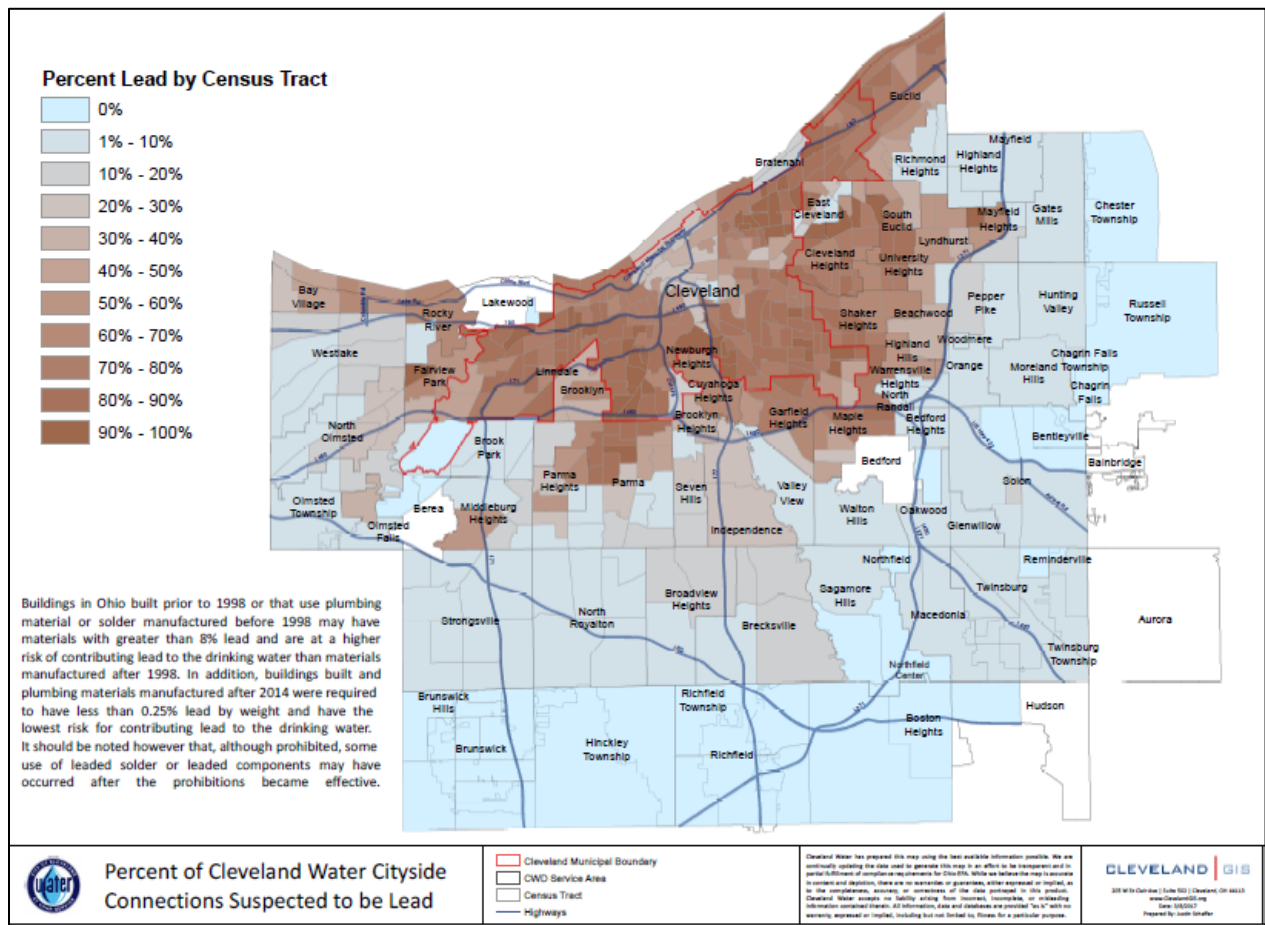


Figure 1 – Cleveland water service area with lead line frequency shown