



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

July 29, 2021

Limited Environmental Review and Finding of No Significant Impact

**City of Elyria – Lorain County
Lead Service Line Replacement Phase 2
Loan number: FS390337-0028**

The attached Limited Environmental Review (LER) is for a lead service line replacement project in Elyria 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: Lead Service Line Replacement Phase 2

Applicant: City of Elyria
131 Court Street
Elyria, OH 44035

Loan Number: FS390337-0028

Project Summary

The City of Elyria in Lorain County (see Figure 1) has requested \$1,000,000 from the Ohio Water Supply Revolving Loan Account (WSRLA) to replace lead service lines in a section of the Elyria water distribution system. This project will replace lead service lines in the public right-of-way and private lead or galvanized service lines with copper tubing. Elyria intends to systematically replace all lead service lines in the water distribution system with non-lead pipe. The WSRLA financing will be principal forgiveness, which means the loan need not be repaid.

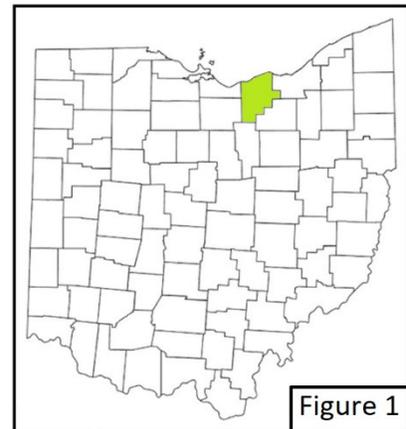


Figure 1

History & Existing Conditions

The City of Elyria draws water from Lake Erie. The Elyria water treatment plant (WTP) produces 22 million gallons per day (MGD) of treated surface water, distributed through 231 miles of water lines, seven pump stations, and five storage tanks. Elyria distributes an average of 15.2 MGD among 21,950 service connections to a population of 53,910.

Elyria is working on mapping the location of lead water lines, both public and private, throughout the city based on historical records, water tap cards, records from the Building Department, and other miscellaneous city records. The city is also developing a comprehensive listing of water infrastructure as water equipment is replaced, such as water meters, water mains, and other future improvement projects. Elyria's older neighborhoods are serviced with galvanized pipes but the vast majority of neighborhoods are serviced with copper or PVC pipe. The city has intentions to create an online 'self-reporting' portal for customers to record building age and internal plumbing and additional information, that will serve as an official database, which will help track lead and galvanized pipe presence throughout the city.

The lead mapping project has continued to reveal small amounts of lead in water lines on the private side (see Figure 2). This is the second phase in a multi-phased approach to eliminating all lead and galvanized service lines in the city, as well as replacement of the Cleveland Street water main which will eliminate 75 lead service lines. Phase 1 of the project addressed approximately 250 lead public and private service lines.

City Of Elyria Water System
OH 4700411

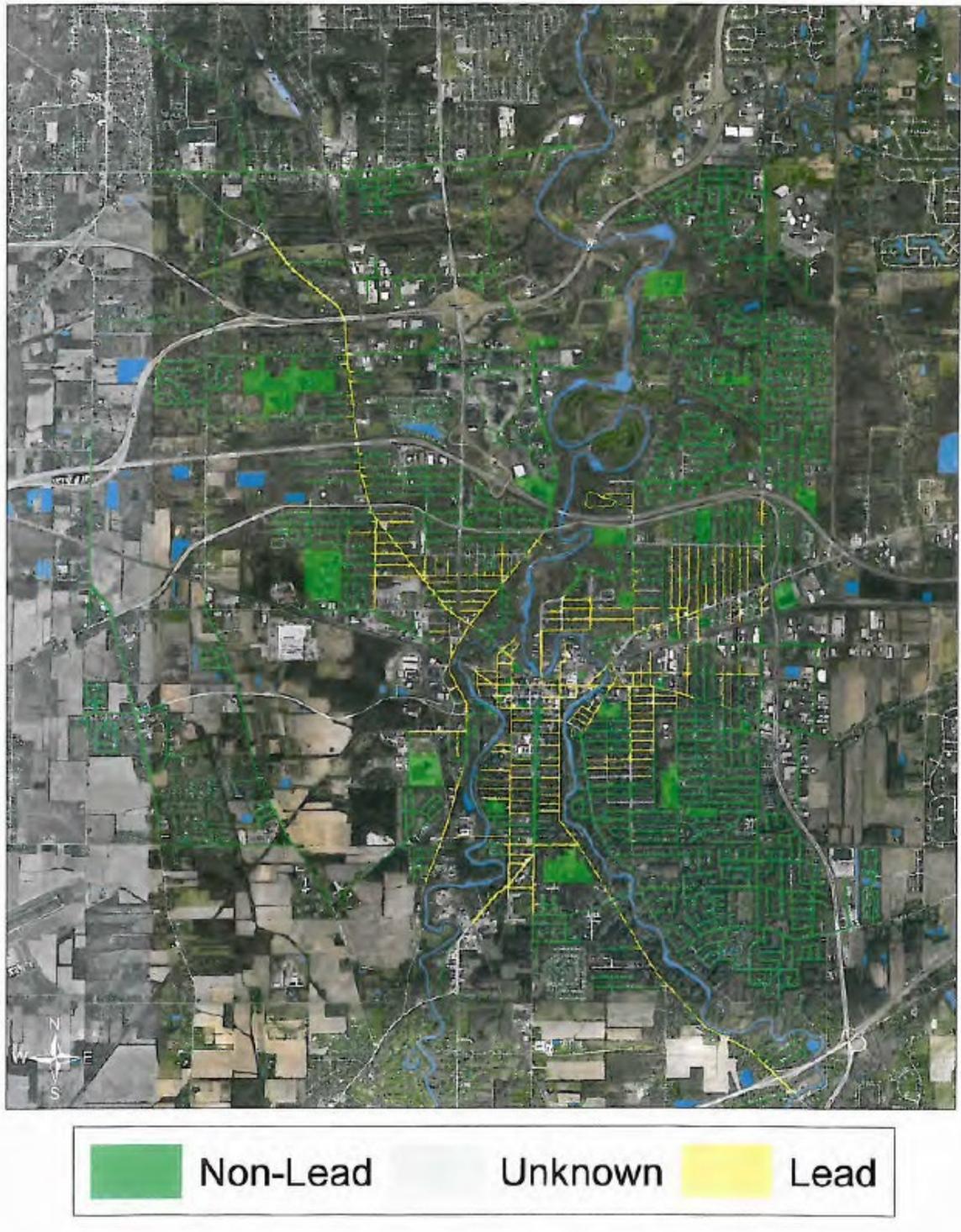


Figure 2. Map of Elyria’s known lead waterlines and non-lead lines

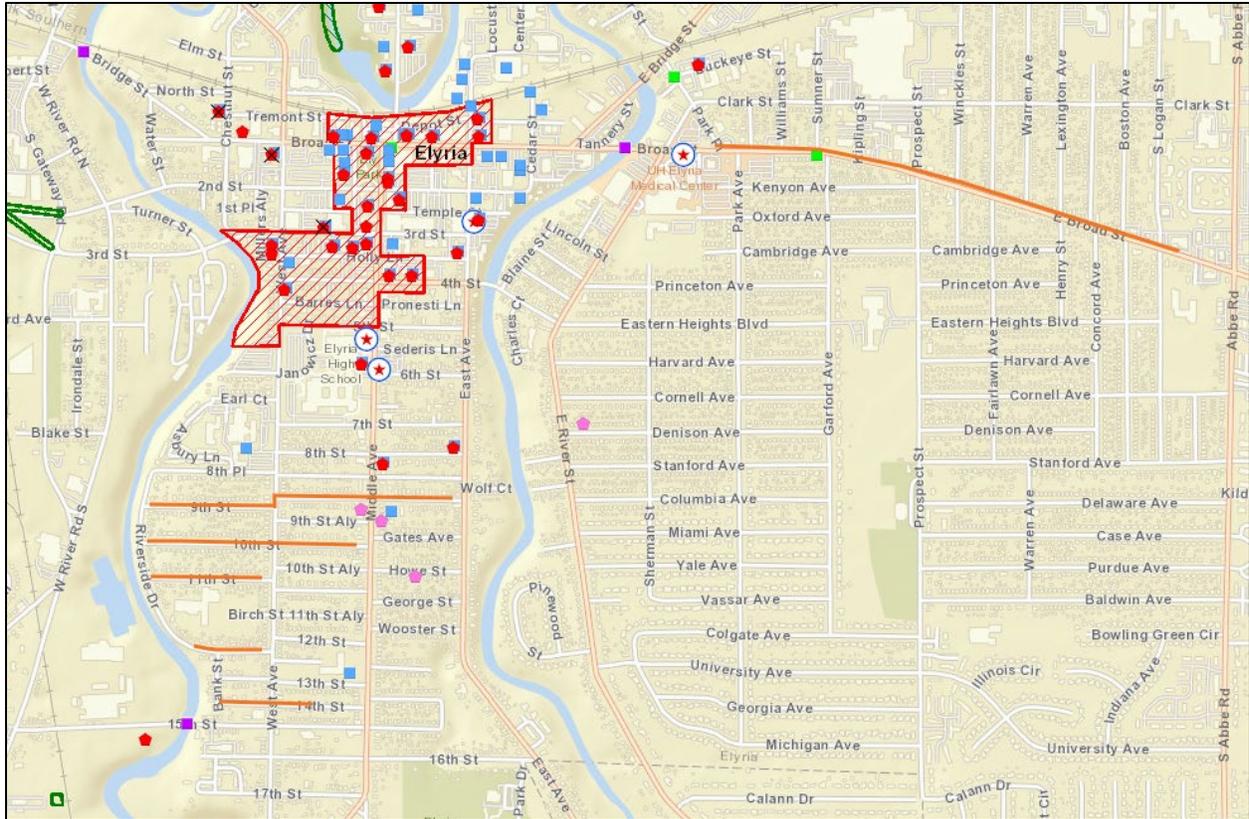


Figure 3. Proposed LSL project area marked in orange

Project Description

This project is replacing approximately 285 lead or galvanized water lines. Public and private service lines will be replaced as determined by the City of Elyria’s assessment of possible lead service water lines along part of East Broad Street, 9th Street, and 12th Street (See Figure 3). Replacement of both the public and private side of the water lines will be completed at no cost to homeowners. If any previously unknown private lead service water lines are discovered when public lead lines are dug and replaced, these will also be replaced with copper service lines.

Elyria will obtain permission for the construction contractor to enter private property to replace the private water line through the city’s standard work agreement.

Trees may need to be cut down if they are very close to existing lines.

Water will be temporarily shut off during pipe replacement in construction areas.

Implementation

Elyria is eligible for up to \$1,000,000 from the WSRLA in principal forgiveness, which does not need to be repaid. During the 10-year loan period, Elyria will save approximately \$1,068,000 by using WSRLA dollars at this rate, compared to the market rate of 1.78%.

A typical Elyria residential water customer pays \$23.35 per month. The last water rate increase was 4% in 2017 and rates will not need raised further over the next few years. According to the 2014-2018 American Community Survey, the estimated median household income (MHI) for a resident of Elyria is \$43,360. The average water utility bill costs amount to \$280 per year, which is 0.65% of the MHI and compares favorably to the Ohio average water bill, \$639.

Anticipating loan award in August 2021, construction work will be completed by 2022.

Public Participation

Elyria has promoted their lead service line replacement program for several years and this project and its financing has been discussed and approved at council meetings. The city has made thorough efforts through letters to the public, lead water line information on the city website, and guidelines to inform the public about this project and how to reduce lead in drinking water.

Ohio EPA is unaware of any public controversy 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#169638770-wsrla-documents-for-review-and-comment> (under the "What's New tab in the "WSRLA Documents Available for Review and Comment list) and distribute it to interested parties upon request. Information supporting the LER is available from the project contact named below.

Conclusion

The proposed lead service line replacement project meets the project type 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 water lines. 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 has no effect on high-value environmental resources – Construction of water line replacements will be in the street right-of way or in residential tree-lawn, in developed residential areas that lack ecologically valuable environmental resources or habitat. When trees will be cut down in locations where they are very close to service lines, the tree cutting window will be limited to October 1 to March 31 to avoid negatively impacting threatened and endangered bat species. Standard construction best management practices will minimize noise and dust, and traffic disruptions will be temporary with appropriate traffic maintenance measures present. Temporary service interruptions will be conveyed to residents before construction starts.

Is cost-effective and is not a controversial action – Replacing lead water lines with copper water lines is more cost-effective than coating water lines because it permanently removes the possibility of lead leaching into drinking water and the surrounding environment. Ohio EPA is unaware of controversy or opposition to the project. The City of Elyria and its agents have permission to enter properties for this work based on local ordinances. Additionally, this project will not increase residential water rates.

Does not create a new, or relocate an existing discharge to surface or ground waters, and 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, and will not provide capacity to serve a population substantially greater than the existing population. – This project will only be replacing existing lead and galvanized iron water lines to eliminate a threat to public health. There are no changes to water treatment, sources, or discharge.

The project planning review did not identify any potentially significant short-term or long-term adverse impacts to the quality of the human environment or to 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).

Contact information

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