



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

April 26, 2019

Limited Environmental Review and Finding of No Significant Impact

**City of Toronto - Jefferson County
Euclid Avenue Water Service Line
Loan number: FS390917-0017**

The attached Limited Environmental Review (LER) is for waterline replacement project in Toronto 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, as described in Ohio Administrative Code (OAC) 3745-150-05.

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, as described in OAC 3745-150-04. 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 blue ink, appearing to read "Jerry Rouch", is written over a horizontal line.

for
Jerry Rouch, Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Name: Toronto – Euclid Avenue Water Service Line

Applicant: John Parker, Mayor
City of Toronto
416 Clark Street
Toronto, OH 43964

Loan Number: FS390917-0017

Project Summary

The City of Toronto (Toronto) in Jefferson County has requested \$828,790 from the Water Supply Revolving Loan Account (WSRLA) for the connection of water service lines to an existing water main on Euclid Avenue. The project is intended to reduce service disruptions within the aged distribution system by replacing water service lines, a portion of which are lead service lines.

History and Existing Conditions

Toronto owns and operates the water supply and distribution system for its residential customers. There are two waterlines in the 800 and 900 blocks of Euclid Avenue, with approximately 51 houses. The residential customers in these two blocks are served by a 4-inch diameter sand-cast iron main that is nearly 100 years old, undersized, and breaks frequently. A 12-inch diameter ductile iron main was laid along the street in 1972, but the customer service lines were never connected into this newer and larger main. Toronto has additionally had service line breaks within this area and identified that parts of these service lines are made of lead material.

Project Description

Toronto is proposing to install new taps on the existing 12-inch main and run new copper ¾-inch service lines from the 12-inch main to new curb valves near the edge of the right-of-way, which will be outside of the paved street area. They are also proposing to work with homeowners to replace the entire service line to the house if they find that such service line is made of lead. After all services have been connected to the 12-inch main, the old 4-inch main will be cut off and abandoned.

The construction footprint for this project will remain within the confines of the previously disturbed rights-of-way with no tree clearing to occur. The contractor is responsible for best management practices to control erosion and sedimentation and maintain local traffic during construction.

Maps of the project location are provided in the exhibits below.

Implementation

Project Costs

Toronto plans to borrow \$828,790 from the WSRLA. During the 20-year loan period Toronto will save approximately \$172,048 by using WSRLA dollars at the Economic Affordability rate of 1.59%, compared to the market rate of 3.34%.

Local Economy

Debt for this project will be repaid from residential water bills. The median household income (MHI) in Toronto is \$39,097. The current Toronto residential water bill is \$441/year and is projected to increase to approximately \$464/year. This represents 1.2% of the (MHI) which is considered affordable.

By using WSRLA financing for this project, Toronto has minimized the economic impact on customers.

Project Schedule

The anticipated loan award will occur in May 2019. Construction is expected to begin immediately and be completed by October 2019.

Public Participation

Each resident is to be informed of the project through a letter defining the project scope and timeframe. Councilman Ward also plans to visit with residents to explain the project and answer any questions they may have.

Ohio EPA is unaware of any public opposition to the project.

Reviews of the respective environmental resources were completed by Ohio EPA, Division of Environmental and Financial Assistance. The review agency does not oppose the project.

Ohio EPA 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, scroll to: "Documents Available for Review and Comment – WSRLA Documents for Review and Comment") and will provide it upon request to interested parties. Information supporting this Limited Environmental Review (LER) is available from the project contact named below.

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public water system, which involves the functional replacement of and improvements to existing mechanical equipment. Furthermore, the project meets the other qualifying criteria for an LER for the following reasons:

- *It has no significant environmental effect, no effect on high value environmental resources, and does not require extensive specific impact mitigation.*
Construction for this project will occur within the rights-of-way, which lacks important environmental features. Standard construction best management practices will be required to control dust, erosion and sediment runoff, noise, and maintain safety.

- *It is cost effective and not controversial.*
The proposed project is cost-effective as it involves utilizing the existing water main that was previously installed in 1972 and connecting residential service lines into this readily available structure. DEFA is unaware of any specific opposition to or controversy about this project that will eliminate the use of lead service lines and cease frequent waterline breaking to ensure reliable water distribution in Toronto.
- *It does not create a new, or relocate an existing, discharge to surface or ground waters; will not create a new source of water withdrawals from either surface or ground waters; will not 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; and will not provide capacity to serve a population substantially greater than the existing population.*
The project involves replacement of water mains and service lines and does not otherwise alter Toronto's municipal water system (withdrawal, treatment, distribution, or usage of potable water). It has no effect on water discharges, or on any other potential source of pollutants. The project will not increase the city's present drinking water capacity, so it will not facilitate an expansion of water service.

Based upon the available planning information for this project and the materials presented within this LER, Ohio EPA concludes that the proposed project will not result in any significant adverse impacts to any environmental features. 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 such as surface waters, coastal zones, riparian areas, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species.

This project will help Toronto's residential water system operate more efficiently and eliminate the use of an unstable and undersized waterline to improve the overall reliability of its public drinking water system. Additionally, this project will involve removal of lead service lines that could be harmful to public health.

Contact

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Exhibit 1: Project Location Map

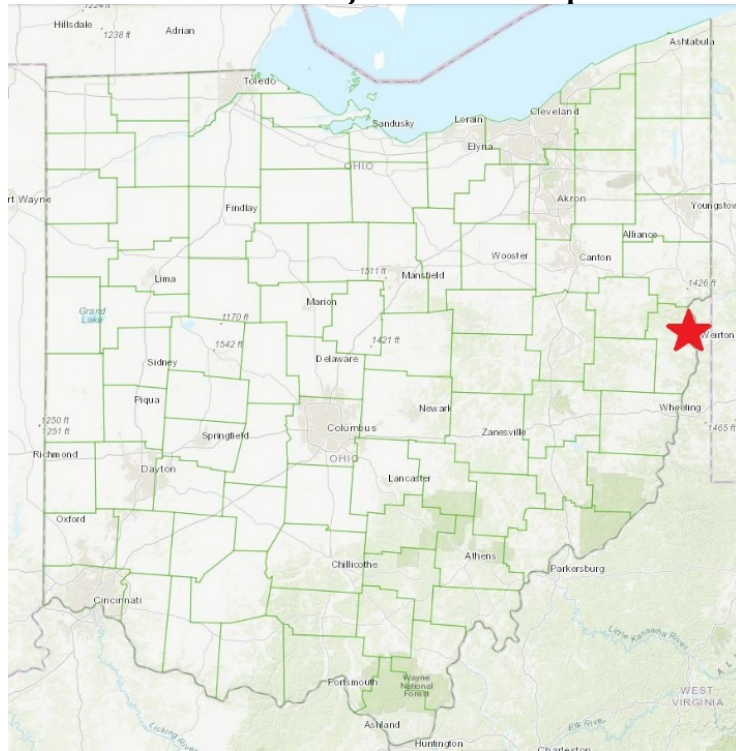


Exhibit 2: Project Location Map

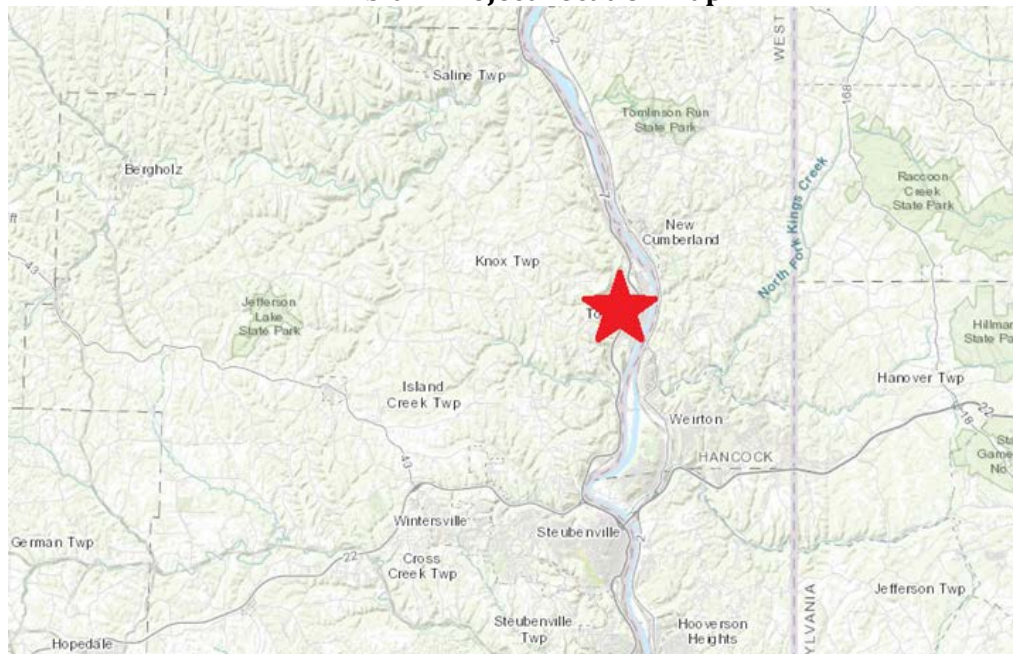


Exhibit 3: Project Location Map

