



**June 4, 2024**

**Limited Environmental Review and Finding of No Significant Impact**

**City of Toronto – Jefferson County  
East 5<sup>th</sup>/Myers Street Water Line & Lead Line Replacement  
Loan number: FS390917-0027**

The attached Limited Environmental Review (LER) is for a water line 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.

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,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Project: East 5<sup>th</sup>/Myers Street Water Line & Lead Line Replacement

Applicant: City of Toronto  
416 Clark Street  
Toronto, Ohio 43964

Loan Number: FS390917-0027

### **Project Summary**

The City of Toronto in Jefferson County has requested \$394,068 from the Water Supply Revolving Loan Account (WSRLA) for the replacement of water lines, including lead service lines, in the East 5<sup>th</sup> Street and Myers Street area. The project is intended to reduce service disruptions within the aged distribution system by replacing deteriorated water service lines, as well as reducing public health hazards through the removal of lead service lines. Construction work will take place within previously disturbed rights-of-way and is not expected to cause adverse environmental impacts.

### **History & Existing Conditions**

Toronto owns and operates its water supply and distribution system and serves approximately 5,100 customers. The area defined by this project is along 5<sup>th</sup> Street, from Henley Street to Myers Street, and along Myers Street from 5<sup>th</sup> Street to River Street. The area is primarily residential, and the water line services approximately 65 customers.

The existing 6-inch water line within this area is susceptible to leaks and breaks which has increased the city's costs and maintenance work. During the repair of breaks, lead lines have been discovered. Lead drinking water lines pose a health hazard and need to be replaced.

### **Project Description**

The selected alternative is to replace the existing water lines to mitigate water main breaks through the service area. By upgrading the aged pipes and removing lead water lines, the project will remove lead from the system, decrease water loss, and increase water quality.

Toronto will replace approximately 1,700 feet of 6-inch water line with new 8-inch polyvinyl chloride (PVC) water line. Water services will be replaced from the main to the right-of-way line. If during replacement a private lead service line is identified, the entire service will be replaced up to the meter.

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 \$394,068 from the WSRLA. Toronto is eligible for Lead Service Line Principal Forgiveness for a portion of the project and will receive a 0% interest rate for the remainder of lead service line replacement costs. The remainder of the project will consist of a 30-year loan period where Toronto will save \$141,500 by using WSRLA dollars at the small-community rate of 2.38%, compared to the market rate of 4.18%. WSRLA interest rates are set monthly and may change for a later loan award.

### *Local Economy*

The current Toronto residential water bill is approximately \$795 per year. Projected residential water bills with the implementation of this project are expected to increase to approximately \$810 annually, which is approximately 1.8% of median household income (MHI) of Toronto, or \$44,960.

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

### *Project Schedule*

The anticipated loan award will occur in June 2024. Construction is expected to begin following loan award and be completed by the beginning of 2025.

## **Public Participation**

Toronto has discussed the project at several public meetings and will hold additional public meetings as needed. Meetings have been advertised through the local newspaper to achieve maximum public participation. Each affected resident will be contacted by letter defining the project scope and time frame. The city is available for further explanation of the project and to answer any questions they may have.

Ohio EPA will make a copy of this document available to the public on its web page: <https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements> 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 distribution lines. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

**Has no significant environmental effect, no effect on high value environmental resources, and does not require extensive specific impact mitigation.**

The city does not anticipate any long-term adverse impacts to environmental resource caused by the necessary construction activity to replace existing equipment and no tree clearing is to occur. The proposed construction activity for the water line improvements project will be confined to the existing project area and the contractor is responsible for best management practices to control noise, dust, traffic disruption, and erosion and sediment runoff.

**Is cost effective and not controversial.**

The proposed project is cost effective as water line replacement provides a lower capital cost compared to repairing water main breaks over time. Ohio EPA is unaware of any specific opposition to or controversy about this project that will eliminate the use of lead service lines and cease frequent water line breaking to ensure reliable water distribution in Toronto.

**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.**

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.

**Will not provide capacity to serve a population substantially greater than the existing population.**

This project does not increase treatment capacity or extend service into undeveloped areas.

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.

This project will help Toronto's residential water system operate more efficiently and eliminate the use of an unstable water line 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 Information**

Kristin Parrish  
Ohio EPA-DEFA  
PO Box 1049  
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Email: [kristin.parrish@epa.ohio.gov](mailto:kristin.parrish@epa.ohio.gov)

**Exhibit 1: Project location map**



**Exhibit 2: Project location map**

