



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

October 25, 2021

Limited Environmental Review and Finding of No Significant Impact

**City of Cambridge – Guernsey County
Lead Service Line Replacement – Phase 1
Loan number: FS390218-0004**

The attached Limited Environmental Review (LER) is for a lead service line replacement project in Cambridge 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 1

Applicant: City of Cambridge
1131 Steubenville Ave
Cambridge, OH 43725

Loan Number: FS390218-0004



Figure 1. Guernsey County

Project Summary

The City of Cambridge, in Guernsey County (Figure 1), has requested funding from the Ohio Water Supply Revolving Loan Account (WSRLA) to finance the Lead Service Line Replacement – Phase 1 project. This project is intended to replace lead service lines across a portion of Cambridge’s water service area.

History & Existing Conditions

Cambridge operates a public water system that serves approximately 10,500 people. The source of water is from Willis Creek which is pumped to the Cambridge Reservoir. The reservoir has a 30-day storage capacity. Cambridge’s water treatment plant has a treatment capacity of roughly seven million gallons per day, but the current average production is about 3.58 million gallons per day.

Cambridge currently has 934 lead service lines within their distribution system. Lead service lines are a potential source of lead in drinking water and pose health risks to water users. Cambridge intends to replace lead service lines across their system in a multi-phased approach. Removing potential lead sources is part of Cambridge’s asset management program and will improve water quality and safety.

Project Description

This project involves the replacement of an estimated 200 public lead service lines, and private lead service lines if encountered, throughout a portion of Cambridge’s water service area (Figure 2). Replacement of service lines will take place primarily in paved roads, lawn strips, sidewalks, and lawns.

The contractor will be required to notify residents of construction outside of their homes using door hangers at least 48 hours prior to construction activities and limit water line shutoffs to a 4-hour period unless approved otherwise. Replacement of private lead service lines will be at no cost to homeowners. Cambridge will obtain permission for the contractor to enter private property to replace private service lines through a work agreement.

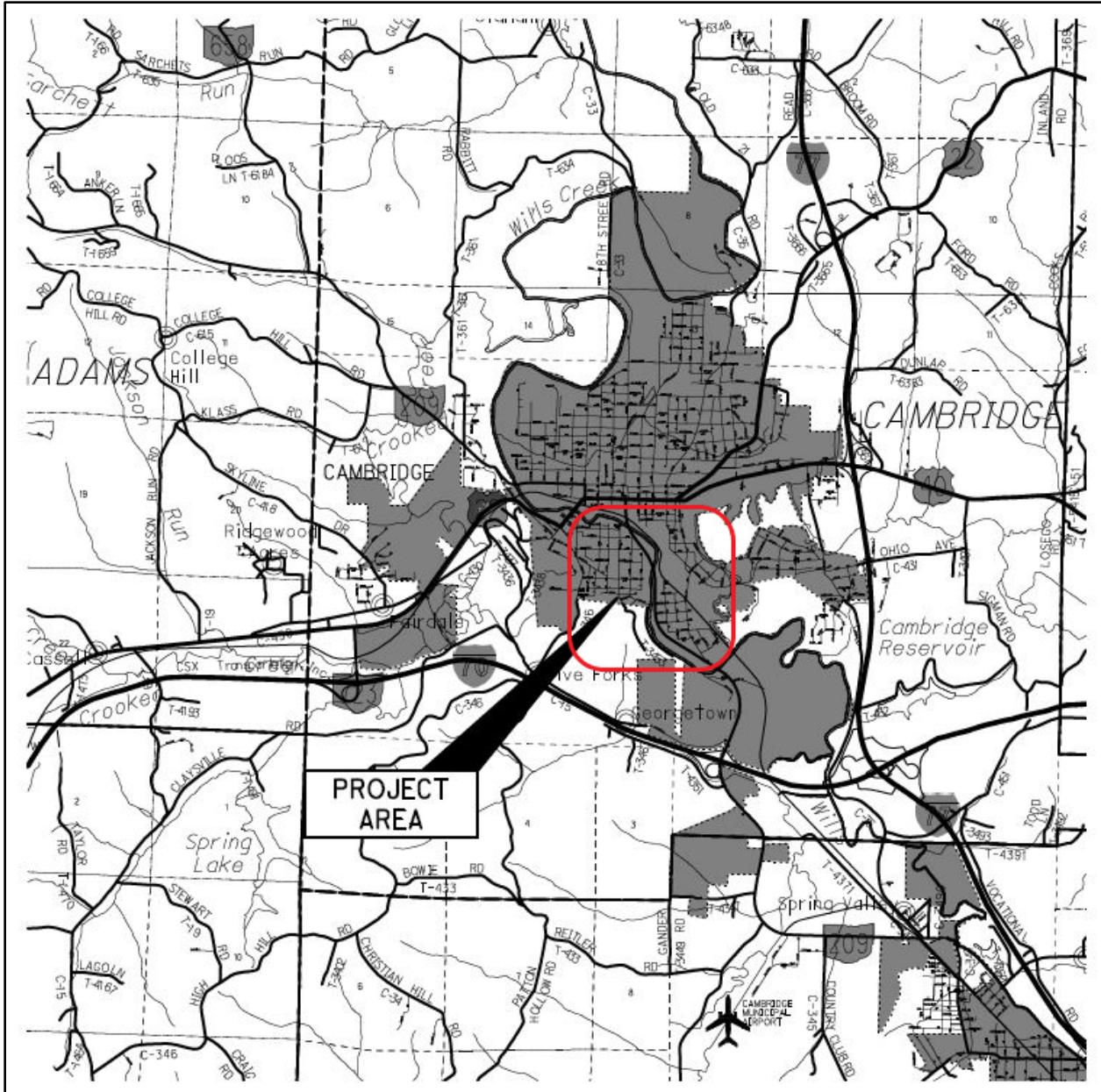


Figure 2. General project area (red)

Implementation

Cambridge proposes to borrow \$1,064,800 from the Ohio WSRLA to fund this project. Cambridge qualifies for the standard below-market interest rate of 0.48% (WSRLA loan interest rates are set monthly and may change for the requested loan award) and is eligible to receive up to \$1,000,000 of the project cost as principal forgiveness, a type of grant-like funding that does not need to be repaid. Assuming a 20-year loan and an award of maximum principal forgiveness, borrowing this amount in WSRLA dollars could save Cambridge approximately \$1,196,127 over the life of the loan compared to the current market rate (1.73%).

The debt associated with this construction project will be recovered from user charges. The average annual water bill for residents served by Cambridge is \$405. This is 1.2% of the median household income (MHI: \$33,184) and compares favorably to the Ohio Average annual water bill, \$639.

Construction is anticipated to begin in February 2022 and be complete by the end of August 2022.

Public Participation

This project has been discussed at two city council meetings and a finance committee meeting. Cambridge has engaged in public outreach regarding the health risks associated with lead service lines and their replacement, and information has been posted to their city website for public viewing. Letters explaining this project have been sent to residents that are suspected of potentially having lead service lines.

Ohio EPA is unaware of controversy about or opposition to this project. Ohio EPA will make a copy of this document available to the public on its web page (<https://www.epa.ohio.gov/defa/ofa> 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 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 replacement of lead service lines. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect, will have no effect on high-value environmental resources, and will require no specific impact mitigation. Replacement of lead service lines will take place primarily in paved roads, lawn strips, sidewalks, and lawns within developed residential areas that lack important environmental resources. No tree removal is anticipated for this project. Standard construction best management practices will minimize erosion, dust, noise, and traffic disruptions. The contractor will be required to restore all disturbed surfaces (e.g., pavement, sidewalk, lawn) to preconstruction or better conditions.

Is cost effective. Replacement of lead service lines is more effective and typically less costly than other methods of lead abatement, such as internally coating service lines with epoxy, because it eliminates the lead pipe and the potential for lead leaching into drinking water and does not reduce the internal diameter and flow of service lines. For these reasons, replacement of lead service lines was determined to be the technically and financially preferred method.

Is not a controversial action. Cambridge has regular water rate increases; however, user rates will not increase because of this project. Replacement of private service lines will be at no cost to residents.

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, does not significantly increase the amount of water withdrawn from an existing water source, does not 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 the capacity to serve a population substantially greater than the existing population. This project merely involves the replacement of lead service lines to existing customers; thus, there will be no impact on water withdrawal, treatment, discharge, or source.

The planning review of this project identified no potentially 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, archaeological or historically significant sites, threatened or endangered species, or state and federal wildlife areas). Applicable construction best management practices will be used on all lead service line replacements.

Contact information

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