



June 4, 2025

Limited Environmental Review and Finding of No Significant Impact

**City of Elyria – Lorain County
Lead Service Line Replacement #5
Loan number: FS390337-0042**

The attached Limited Environmental Review (LER) is for a lead service line replacement project in Elyria which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Supply Revolving Loan Account (WSRLA) below-market interest rate revolving loan program. The LER describes the project, costs, and expected environmental benefits. Making available this LER fulfills the 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 program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. In accordance with Ohio Administrative Code 3745-150-05, this project meets the criteria for an LER rather than the more comprehensive Environmental Assessment. More information can be obtained by contacting the person named at the end of the attached LER.

Upon issuance of this Final 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, reading "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Lead Service Line Replacement #5

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

Loan Number: FS390337-0042, et seq.

Project Summary

The City of Elyria in Lorain County (see Figure 1) has requested funding from the Ohio Water Supply Revolving Loan Account (WSRLA) to replace lead service lines (LSLs) in a section of the Elyria water distribution system. This project, and subsequent similar projects, will replace old LSLs in the public right-of-way and private lead or galvanized steel service lines with copper tubing. The project is eligible for a portion of the loan as principal forgiveness, which means this amount need not be repaid.

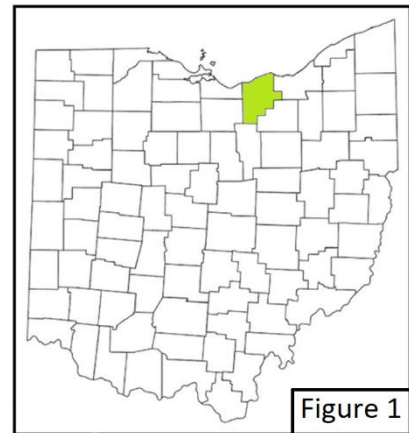


Figure 1

History & Existing Conditions

The City of Elyria draws water from Lake Erie and treats it at the city-owned water treatment plant (WTP). The WTP produces 22 million gallons per day (MGD) of treated surface water, distributed through 231 miles of water line, seven pump stations, and five storage tanks. Elyria distributes an average of 15 MGD among 21,950 service connections and a population of 53,821 people.

Elyria's older neighborhoods are serviced with galvanized iron pipes, but the vast majority of neighborhoods are serviced with copper or plastic PVC pipe. Elyria is working on mapping the location of LSLs, 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 list of water infrastructure, both as water equipment is replaced, and future improvement needs. 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.

The lead mapping project has continued to reveal small amounts of LSLs on the private side (see Figure 2). Four phases of lead line replacements are already constructed or are underway, as well as

replacement of the Cleveland Street water main which will eliminate 75 LSLs. Lead in drinking water lines can potentially harm residents and should be removed.

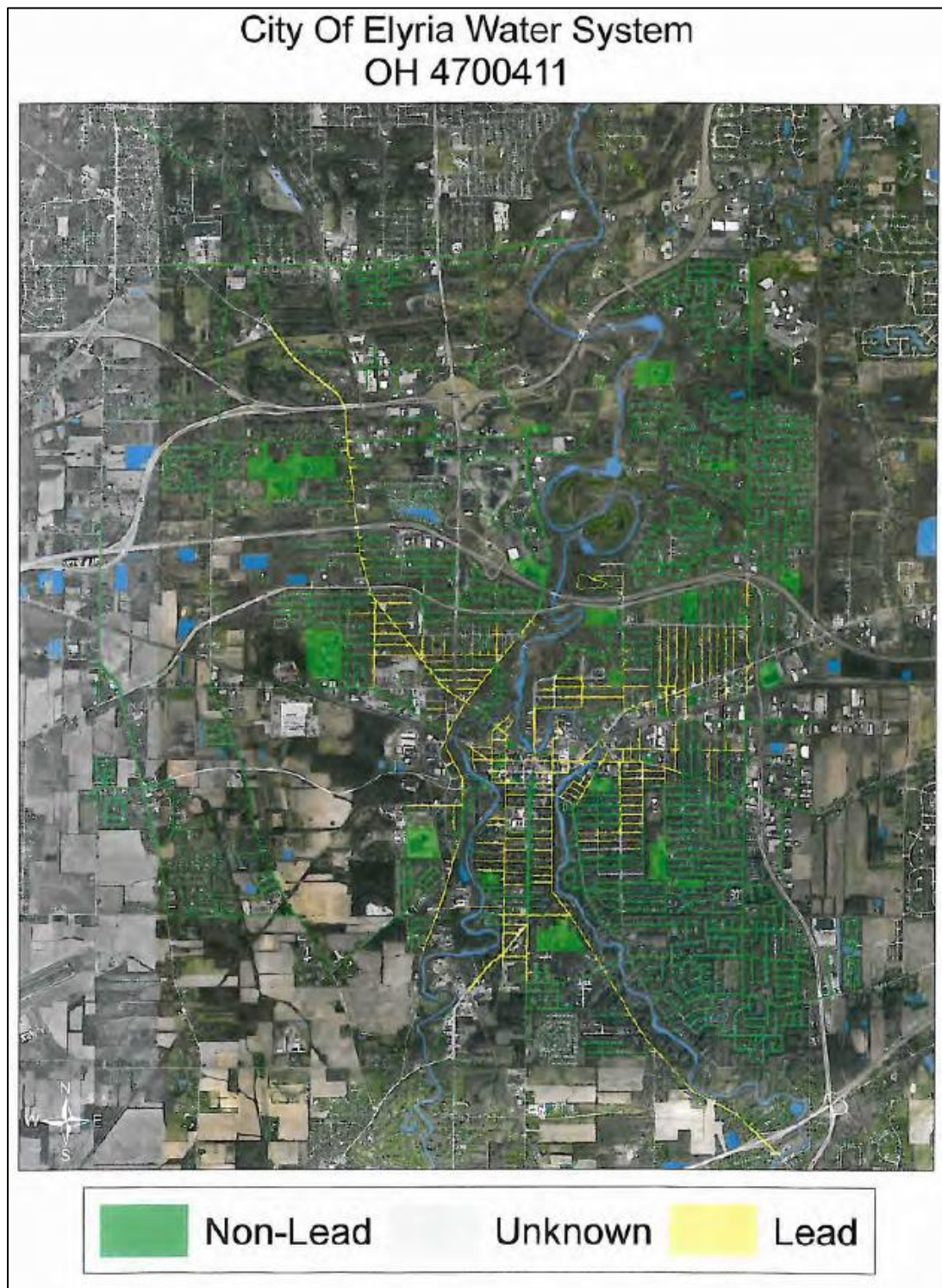


Figure 2. Map of Elyria's known lead water lines and non-lead lines

Project Description

For the Phase #5 LSL replacement project, approximately 380 known public LSLs and lead or galvanized private service lines as determined by the assessment of known LSLs. Replacements will be along the following streets: Beebe Avenue, Bellfield Avenue, Bon Air Avenue, Brandtson Avenue, Caroline Street, Elma Drive, Hawthorne Street, Lafayette Street, Longfellow Street, Longford Avenue, Marseilles Avenue, Olive Street, Pasadena Avenue, and Roosevelt Avenue (see Figure 3). Replacement of the public and private LSLs will be covered by the project funding, and at no cost to homeowners. If any previously unknown private LSLs are discovered, these will also be replaced with copper service lines.

Elyria will obtain permission for the construction contractor to enter private property to replace LSLs through the city's standard work agreement. Water will be temporarily shut off during pipe replacement in construction areas.

No trees will need to be removed for this project.

Elyria intends to systemically eliminate all LSLs in the city, in a multi-phased approach. Three phases have already been completed, the fourth is in progress currently, and this fifth phase will eliminate another portion of LSLs. Future phases will be nominated yearly by the city until all LSLs are eliminated.

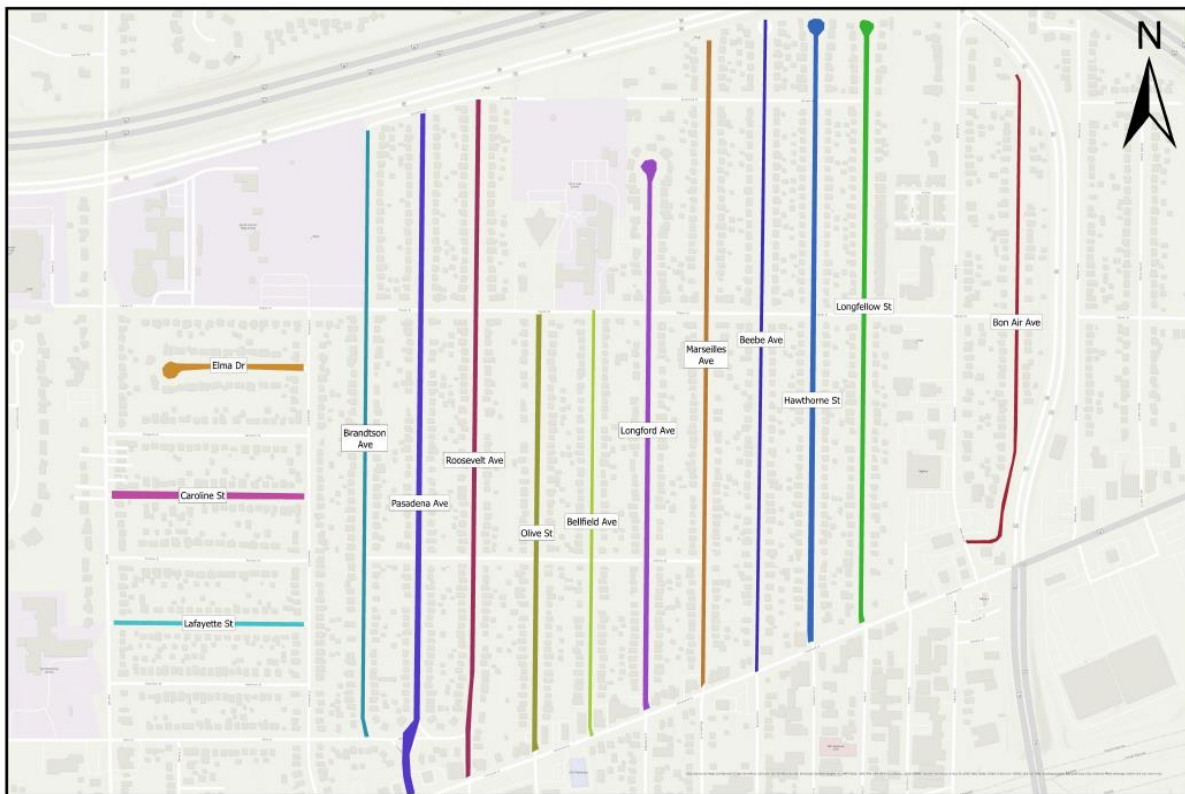


Figure 3. Phase 5 project area map

Implementation

Elyria has requested \$4,491,857 from the WSRLA for the fifth phase of LSL replacement; they are eligible for a portion of this amount as principal forgiveness. Any remaining costs will be financed at a 0% interest rate. For the 30-year loan term, Elyria will save a significant amount of money using principal forgiveness and WSRLA funding.

A typical Elyria residential water customer pays \$40 per month. The last water rate increase was 15% in 2025, with 15.25% rate increases planned for 2026 and 2027. According to the 2017-2021 American Community Survey, the estimated median household income (MHI) for a resident of Elyria is \$46,034. The average annual water utility bill will be \$584 in 2027, which is 1.27% of the MHI and is higher than the Ohio average water bill, \$477.

Anticipating loan award in June 2025, construction work will begin shortly after, with completion expected within 12 months. Future project phases will be nominated approximately once per year until all LSLs are replaced.

Public Participation

Elyria has promoted their LSL replacement program for several years and this project and its financing has been discussed and approved at council meetings. Elyria residents have been aware of the LSL replacement projects as the city systematically replaces public and private LSLs. The City of Elyria has made thorough efforts through letters to the public and information on the city website such as lead health-related information and guidelines about this project and reducing lead in drinking water. Elyria also includes an interactive LSL map that shows the currently known materials of each property's service lateral on their website.

Ohio EPA is unaware of any controversy about or opposition to this project. The Limited Environmental Review (LER) and Finding of No Significant Impact (FNSI) will be posted on the Ohio EPA Division of Environmental and Financial Assistance website. Additionally, the LER and FNSI have been provided to the City of Elyria to be made available according to their public notification procedures.

Conclusion

The proposed project meets the 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 infrastructure. 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 service 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. No trees will be cut down to replace the

water lines. 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. There is no alternative to removing lead service lines. This project will not increase residential water rates and Ohio EPA is unaware of opposition to the project.

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 lead and galvanized iron water service 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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