



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

April 29, 2021

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

**City of Alliance – Stark County  
Lead Service Line Replacement  
Loan number: FS390099-0006**

The attached Limited Environmental Review (LER) is for a water distribution system project in Alliance 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 Name: Lead Service Line Replacement

Applicant: City of Alliance  
504 E. Main St.  
Alliance, OH 44601

Loan Number: FS390099-0006, et seq.

### **Project Summary**

The City of Alliance in Stark County has requested \$1,000,000 from the Ohio Water Supply Revolving Loan Account (WSRLA) for the Lead Service Line Replacement project to replace lead service lines in the Alliance water distribution system. The WSRLA financing will be in the form of principal forgiveness, a loan that does not need to be repaid. Due to the nature of the project, environmental impacts will be minimal. This limited environmental review covers this initial loan and subsequent lead service line replacements.

### **History & Existing Conditions**

The City of Alliance is located in the northeast corner of Stark County and has a population of 21,927. The city's drinking water is sourced from Deer Creek Reservoir and treated at the Alliance water treatment facility.

The city has encountered lead service pipes in the public area between the water main and the curb stop, and the number of private lead service lines is unknown (see Figure 1). To eliminate the dangers associated with lead in drinking water, the city intends to remove all lead service lines.

### **Project Description**

This project includes checking for public and private lead service lines at approximately 450 properties in Alliance. Replacement of lead line will be by a contractor selected by competitive bidding and will be at no cost to the property owner. Initial service line material verification and all restoration of the work site (asphalt, concrete, grass) will be completed by the City. The City will also arrange for traffic safety measures and spoil disposal. Water will be temporarily shut off during pipe replacement.

The majority of lead service lines are expected to be in the public section. If private lead lines are discovered, they will be removed at no cost to the homeowner. Each replacement will cost approximately \$2,130 (based on 30 feet of service line, for both public and private service replacement).

The goal is to eliminate all lead service lines in Alliance, which may require future WSRLA loans or other financing. As long as the lead service line replacement principal forgiveness continues to be available, Alliance will continue to seek funding of work.

## **Implementation**

Alliance requested \$1,000,000 from the WSRLA in the form of a principal forgiveness loan, which will not need to be repaid. During the standard 20-year loan period, Alliance will save \$1,200,948 by using WSRLA dollars at this rate, compared to the current market rate (April 2021) of 1.85%.

The average annual residential water bill in Alliance is \$410, which is 1.1% of local median household income (MHI; \$35,020) and compares favorably to the Ohio average bill, \$639.

All work will be completed in 18 months after loan award.

## **Public Participation**

The project has been discussed regularly in open council meetings, which in turn has been reported by the local newspaper.

The City will mail a flyer to all 3,200 homes with potential private lead lines in advance of project initiation. The flyer will also be posted on the City's website. Homeowners can apply on the website for inclusion in the project.

Ohio EPA is unaware of the controversy about 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> under the "What's New" tab in the "WSRLA Documents Available for Review and Comment" list) and will provide it upon request.

## **Conclusion**

Due to the nature of the proposed improvements, and the limited, previously disturbed locations where lead service lines are typically sited, Ohio EPA has determined that these project activities should have no significant adverse effect on major land forms, terrestrial or aquatic habitat, rare or endangered species, surface water, ground water, wetlands, floodplains, land use patterns, agriculture, air quality, archaeological and historical resources, noise, traffic, aesthetics, energy resources, or the local economy. Public health threats will be reduced by eliminating existing sources of lead in drinking water.

The proposed lead service line replacement is a water system infrastructure improvement (rehabilitation of existing facilities) that qualifies for a Limited Environmental Review (LER) and meets the following additional criteria for an LER:

**Will have no significant environmental effect, does not require extensive specific impact mitigation, and will have no effect on high-value environmental resources.** Construction will be done in the existing right-of-way and in lawns in developed residential locations that lack important environmental resources. Due to the nature of the work to replace private lead service lines using an excavation tool, any impacts will be minimal to non-existent. Temporary water service interruptions will be communicated to affected customers.

**Is cost-effective and not controversial.** This project will have no impact on residential water rates due to the principal forgiveness loan provided by Ohio EPA. There is no feasible alternative to replacing lead service lines.

Ohio EPA is unaware of controversy about or opposition to this project.

**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, 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.** The project will merely improve existing infrastructure and eliminate a threat to public health and have no effect on water withdrawal, treatment, discharge, or water source.

**Will not provide capacity to serve a population substantially greater than the existing population.** The project involves replacing existing lead service lines in Alliance and does not impact capacity.

The planning activities for the project have identified no potentially significant adverse impacts. 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. Applicable construction impact mitigation measures and practices will be followed on all lead service line replacements. The project will eventually eliminate lead material from drinking water lines, which will reduce public health threats.

**Contact information**

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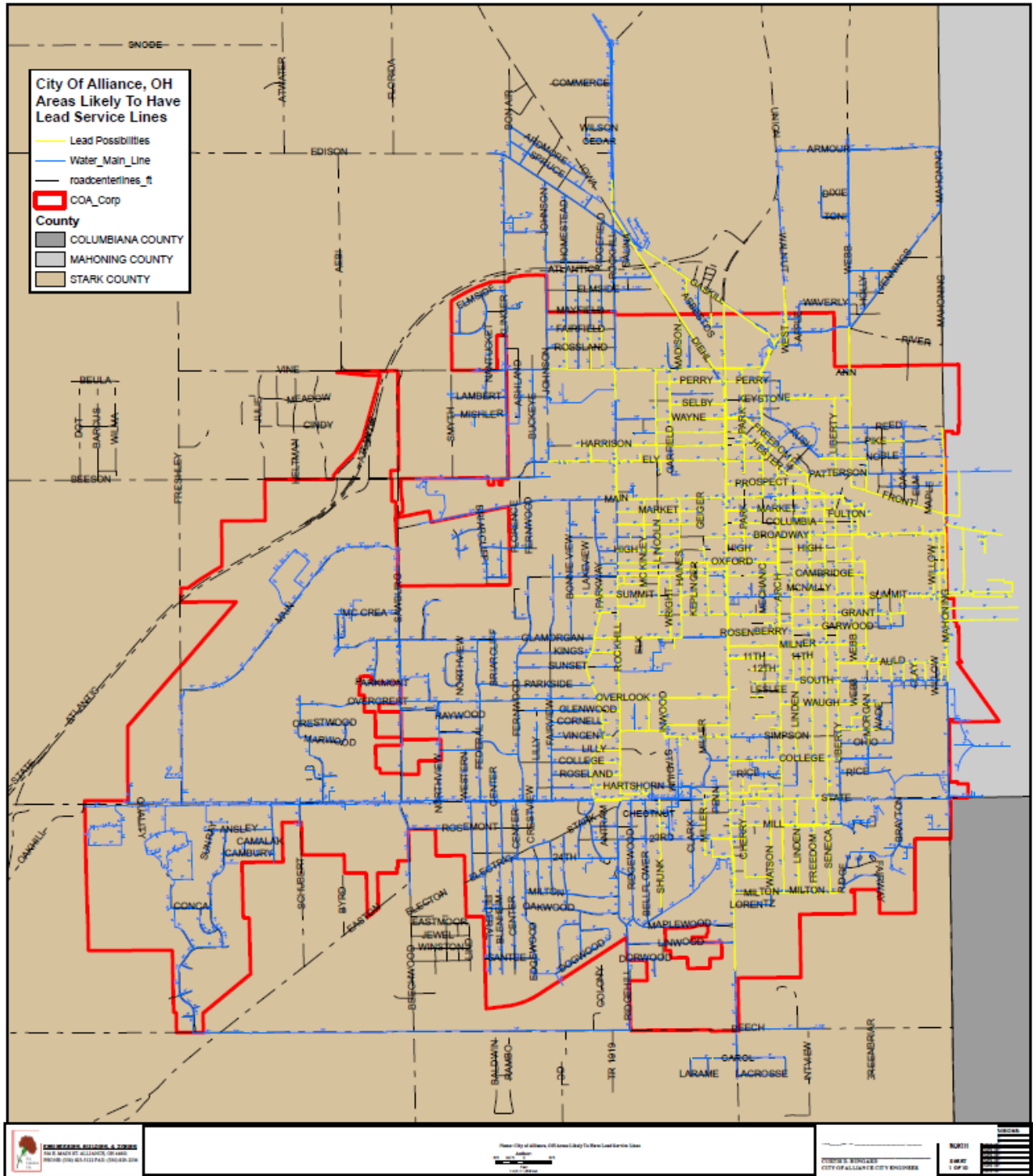


Figure 1 - Alliance water service area