



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

November 4, 2021

Limited Environmental Review and Finding of No Significant Impact

**City of Shelby – Richland County
Main Street Water Service Line Replacement
Loan number: FS390849-0016**

The attached Limited Environmental Review (LER) is for a drinking water distribution project in Richland County 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: Main Street Water Service Line Replacement

Applicant: City of Shelby
43 West Main Street
Shelby, Ohio 44875

Loan Number: FS390849-0016

Project Summary

The City of Shelby in Richland County has requested \$311,200 from the Ohio Water Supply Revolving Loan Account (WSRLA) for the Main Street Water Service Line Replacement project to replace lead service lines (LSL) in the Shelby 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. Construction is scheduled to begin in December of 2021 and last approximately seven months.

History & Existing Conditions

The City of Shelby is located in northwestern Richland County (see Figure 1) and has a population of 8,866. Shelby's water treatment plant (WTP) is supplied by surface water intakes on Black Fork Creek and Marsh Run and is stored in two water reservoirs with a combined capacity of 588 million gallons (MG). The WTP has capacity to treat four million gallons per day (MGD) of water, but it currently treats an average of 1.2 MGD. Treated water from the WTP is stored in a one MG clearwell and pumped to the city's distribution system.

Lead service lines have been encountered in various sections of the city's distribution system, and Shelby is evaluating and prioritizing replacement of these lines.

Project Description

The proposed Main Street Water Service Line Replacement project (see Figure 2) will replace 41 lead service lines in the Main Street business corridor. This area was chosen for work in this phase of LSL replacement to coincide with a revitalization project that is also planned to occur soon in this area of the city.

Work for the project will be restricted to 8:00 am to 5:00 pm and include temporary traffic controls. The city will also arrange for traffic safety measures, erosion control measures, restoration of all areas, and spoil disposal. Water will be temporarily shut off during pipe replacement.

Implementation

The total estimated loan amount for the project is \$311,200, which Shelby will receive 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, Shelby will save approximately \$376,000 by using WSRLA principal forgiveness monies, compared to borrowing the total project amount at the current market rate (December 2021) of 1.9%.

The average annual residential water bill in Shelby is \$504, which is 1.1% of local median household income (MHI; \$45,417) and compares favorably to the Ohio average bill, \$639.

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

Public Participation

The project has been discussed regularly in open council meetings and utility meetings, reported in local media, and affected residents and businesses have been notified individually of the proposed project. The city will notify all affected residents and businesses of the scheduled and actual construction dates.

Ohio EPA is unaware of the controversy about or opposition to this project and the Limited Environmental Review and Finding of No Significant Impact will be posted on City of Shelby and Ohio EPA Division of Environmental and Financial Assistance websites.

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 Main Street Water Service Line Replacement project 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. Little to no tree removal is expected to take place as part of this project. 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 Shelby 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, and the project will eliminate lead material from drinking water lines, which will reduce public health threats.

Contact information

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Figure 1 – General project area



Figure 2 – Main Street Water Service Line Replacement area (in red)