April 15, 2026

Limited Environmental Review and Finding of No Significant Impact

City of Cuyahoga Falls – Summit County
Lead Line Service Replacement
Loan Number: FS390296-0006

The attached Limited Environmental Review (LER) is for a drinking water project in Cuyahoga Falls 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,

Kathleen Courtright

Kathleen Courtright, Assistant Chief
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LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Lead Line Service Replacement

Applicant: City of Cuyahoga Falls
2310 Second Street
Cuyahoga Falls, Ohio 44221

Loan Number: FS390296-0006

Figure 1. Summit County

Project Summary

The City of Cuyahoga Falls, in Summit County (see Figure 1), requested funding from the Ohio Water Supply Revolving Loan Account (WSRLA) for the Lead Line Service Replacement project. The project involves the replacement of a targeted 400 lead and galvanized steel service lines within the city's distribution system. No significant adverse impacts are anticipated based on the nature and locations of construction and best management practices to be implemented as discussed in the conclusion.

History & Existing Conditions

Cuyahoga Falls owns and operates a wellfield, water treatment plant (WTP), and distribution system. The distribution system consists of two booster stations, three aboveground storage tanks, and roughly 200 miles of 2-inch through 20-inch distribution mains. Raw water is sourced from 18 wells, which draw water from a buried valley aquifer. Water is treated by a process consisting of aeration to eliminate objectionable gases, use of anthracite coal units to remove iron and manganese, and addition of chlorine, fluoride, and caustic soda for disinfection, tooth decay prevention, and corrosion control, respectively. The WTP produces nearly 6 million gallons per day, which is just over half of the plant's total treatment capacity. Cuyahoga Falls serves 55,000 customers within the city and in Munroe Falls and Silver Lake.

Within a distribution system, the pipe connecting a water main to the interior plumbing of a building is known as a service line. Service lines may be owned wholly by the water system or customer, or in most cases, are split in ownership. In the case of split ownership, the service line consists of the system-owned portion, i.e., public side, and the customer-owned portion, i.e., private side. Cuyahoga Falls defines the public side as the portion of the service line from the corporation stop to the service valve and box (curb stop) and the private side as the portion from the curb stop to the customer's main shutoff valve. See Figure 2 for an example of a typical service line.

Service lines within Cuyahoga Falls, like those found in many communities, consist of varying materials including copper, plastic, iron, lead, and galvanized steel. Lead and galvanized steel[1] can act as sources of lead within a water system, which poses a health risk to users.

Cuyahoga Falls completed an initial service line material inventory in 2024 in response to U.S. EPA's release of the Lead and Copper Rule Revisions (LCRR). The LCRR was finalized on December 16, 2021, and included the requirement that all community and non-transient non-community water systems complete and maintain service line inventories of their systems by October 16, 2024. U.S. EPA released the Lead and Copper Rule Improvements (LCRI) on October 16, 2024, which delayed many of the requirements in LCRR not including service line inventories. Per the LCRI, water systems must complete a baseline inventory that builds upon the previously required initial service line inventory by November 1, 2027. Water systems must also achieve 100% lead pipe replacement by 2037.

Cuyahoga Falls currently has 20,945 water services of which 933 are lead, 142 are galvanized steel, 1,902 are unknown, and the remaining 17,968 are copper. Cuyahoga Falls plans to replace approximately 500 lead and galvanized steel service lines per year with the goal of eliminating all lead and galvanized steel service lines by the end of 2034.

Project Description

Cuyahoga Falls will replace up to 400 lead and galvanized steel service lines through this project. The work will be completed via two contracts with each contractor responsible for completing up to 200 service line replacements. Lead and galvanized steel service lines will be replaced on both the public side and the private side.

New service lines will be ¾-inch copper installed by directional drilling. Open trenching may be used in situations where directional drilling is not possible only following approval by the city. Curb stops and water meters will be replaced on an as-needed basis. The contractor will be responsible for restoring disturbed surfaces to preconstruction conditions following project completion. This includes pavement, curb, sidewalk, apron, driveway, and lawn repair. Other responsibilities of the contractor include ensuring adequate construction best management practices are implemented to maintain safe traffic, reduce and manage noise and dust, prevent erosion and sediment, ensure construction is conducted in a safe manner, and prevent offsite environmental impacts.

Implementation

Cuyahoga Falls requested $3 million from the Ohio WSRLA at the discounted rate of 0%, which applies to lead service line portions of a project. Borrowing this amount in WSRLA monies could save

[1] Galvanized steel service lines are referred to as *galvanized requiring replacement (GRR)* when the service line is or was ever at any time downstream of a lead service line or is currently downstream of a service line with an unknown material status. GRR is assumed if a water system is unable to demonstrate that the service line was never downstream of a lead service line. Galvanized service lines downstream of a lead service line or containing lead joints can absorb lead and contribute to lead in drinking water.

Cuyahoga Falls roughly $2,692,000 over the 30-year loan term compared to the current market rate of 4.8%.

The debt associated with the project will be recovered from monthly user charges. The water service charges for Cuyahoga Falls are driven by the total indebtedness of the city and annual operation and maintenance costs. Cuyahoga Falls implemented a five-year water and sewer rate increase schedule to afford the cost of future system improvements. This took effect beginning in 2024. Information on the city's existing rate structure and a copy of their water and sewer improvements plan is available on Cuyahoga Falls' water department webpage.

The average annual residential water bill for residents served by Cuyahoga Falls and based on a monthly usage of 4,000 gallons is approximately $303. This represents 0.43% of the median household income for Cuyahoga Falls (MHI; $70,645) and compares favorably to the Ohio average annual water bill of $481.

Construction is anticipated to begin following loan award and be completed by the end of 2026.

Public Participation

Cuyahoga Falls City Council holds public meetings on the second and fourth Mondays of each month and provides information on meeting time and location, agenda, and minutes for past meetings on their city website. Ongoing and planned city projects are discussed at these meetings including the Lead Line Service Replacement project.

Cuyahoga Falls provided annual updates on the status of lead, galvanized steel, and unknown material service lines within their water system in 2024 and 2025 via letters mailed to residents. The city also provides information on service line material identification, reporting, answers to frequently asked questions, and an interactive service line material map on their website.

Cuyahoga Falls will work with each contractor to develop a notification procedure for contacting property owners ahead of service line replacements. The notification will explain the work to be performed, short-term water shutoff, options for private-side service line replacement, and access agreement.

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 Cuyahoga Falls to be made available according to their public notification procedures.

Conclusion

The proposed project meets the criteria for an LER; namely, it is an action within an existing public water treatment system, which involves the functional replacement of and improvements to existing

mechanical equipment. 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. Service line replacements will take place in existing rights-of-way, sidewalks, lawn strips, and front lawns in developed residential areas where there are no unique, sensitive, or valuable environmental resources.

Is cost effective. There is no viable alternative to eliminating sources of lead within Cuyahoga Falls' water system other than complete removal and replacement. Cuyahoga Falls considered the estimated cost to replace lead and galvanized steel service lines within their system and other anticipated water projects during development of their current 5-year water rate schedule. This was done to ensure sufficient funds would be available for the projects.

Is not a controversial action. The project is such that there will be no significant adverse impacts on residents or the environment, and no controversy against the project has been reported. There is no additional rate increase necessary to fund this project, and private-side service line replacements will be completed at no cost to property owners. Cuyahoga Falls has further reduced the debt service for the project by pursuing low-interest loan funding from the Ohio WSRLA.

Will not create a new or relocate an existing discharge to surface or ground waters, will 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 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. The project is not intended to address, nor will it inadvertently affect, these listed features. The project merely involves the replacement of lead and galvanized service lines that serve existing customers.

Based upon Ohio EPA's review of the planning information and the materials presented in this LER, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to environmental features. 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.

Cuyahoga Falls designed the project to be effective and affordable, the results of which will provide a greater level of public safety for their customers.

Contact Information

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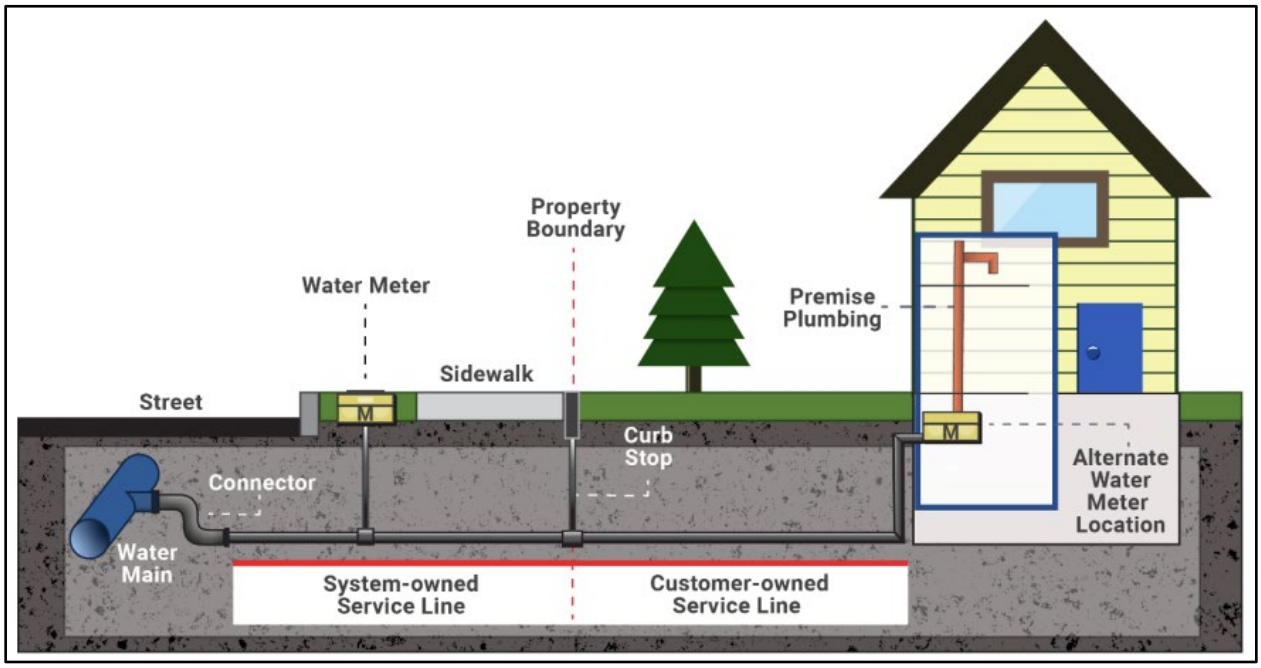

Figure 2. Typical service line configuration