

March 1, 2018

Notice of Issuance of a Limited Environmental Review and Final Finding of No Significant Impact to
All Interested Citizens, Organizations, and Government Agencies

City of Lorain, Lorain County, Ohio
South Lorain Water Line Replacement - Phase 3
PWS ID #OH4700711/Loan #FS390532-0026

The purpose of this notice is to advise the public that Ohio EPA has reviewed the referenced project and finds that neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to complete the environmental review of the project. Instead, the proposed project meets the criteria for a Limited Environmental Review (LER). These criteria are summarized below in this document and in the attached LER.

The Ohio EPA Drinking Water Assistance Fund's (DWAF) Water Supply Revolving Loan Account (WSRLA) program requires the inclusion of environmental factors in the decision-making process for project approval. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed action in its project planning review and approval process. A subsequent review by this Agency has found that the proposed action does not require the preparation of either an EA or an SS.

Our environmental review concluded that, because the proposed project is limited in scope and meets all applicable criteria, an LER is warranted. Specifically, the proposed project constitutes an action in a community with an existing public water system, which involves minor upgrades and/or minor expansion of existing water treatment and distribution systems, including, but not limited to, minor rehabilitation of existing facilities, functional replacement of existing mechanical equipment or structures, and construction of new ancillary facilities adjacent or appurtenant to existing facilities. As such, the City of Lorain's proposed project constitutes an activity meeting these criteria.

Furthermore, the proposed project:

- has no potential for associated significant adverse environmental impacts;
- will not require extensive impact mitigation unique to the assistance proposal;
- will have no effect on high value environmental resources;
- is cost-effective and is not the subject of significant public interest;
- will not create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of 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 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; and

- will not provide capacity to serve a population substantially greater than the existing population.

A map depicting the location of the proposed project is included as part of the LER. The LER presents additional information on the proposed project, its costs, and the basis for our decision. Further information can be obtained by calling or writing the contact person named at the end of the LER.

An LER was completed for the proposed project as it will not individually, cumulatively over time, or in conjunction with other Federal, State, local, or private actions have a significant adverse effect on the quality of the human environment. Consequently, a Finding of No Significant Impact (FNSI) now can be issued for the proposed project.

Upon issuance of this FNSI determination, award of funds may proceed without being subject to further environmental review or public comment, unless information is provided that determines environmental conditions on the proposed project have changed significantly.

Sincerely,

Jerry Rouch, Assistant Chief
Division of Environmental &
Financial Assistance

JR/KH
Attachment

LIMITED ENVIRONMENTAL REVIEW (LER)

Date: March 1, 2018

A. Project Identification

Name: City of Lorain
South Lorain Water Line Replacement - Phase 3

Address: Mr. Dan Given
Safety/Service Director
City of Lorain
200 West Erie Avenue
Lorain, Ohio 44052

Loan No.: FS390532-0026

B. Existing Need

The City of Lorain has identified multiple parts of South Lorain where the existing water lines have failed and need to be replaced through the installation of new water mains. In particular, the existing water mains are being replaced due to age, pipe material, frequency of breaks, and low pressure. These specific areas constitute the project area within the Fulton Pressure Zone (one of three zones in Lorain as shown in green below in Figure 1) and are shown below in Figure 2 (in light blue).

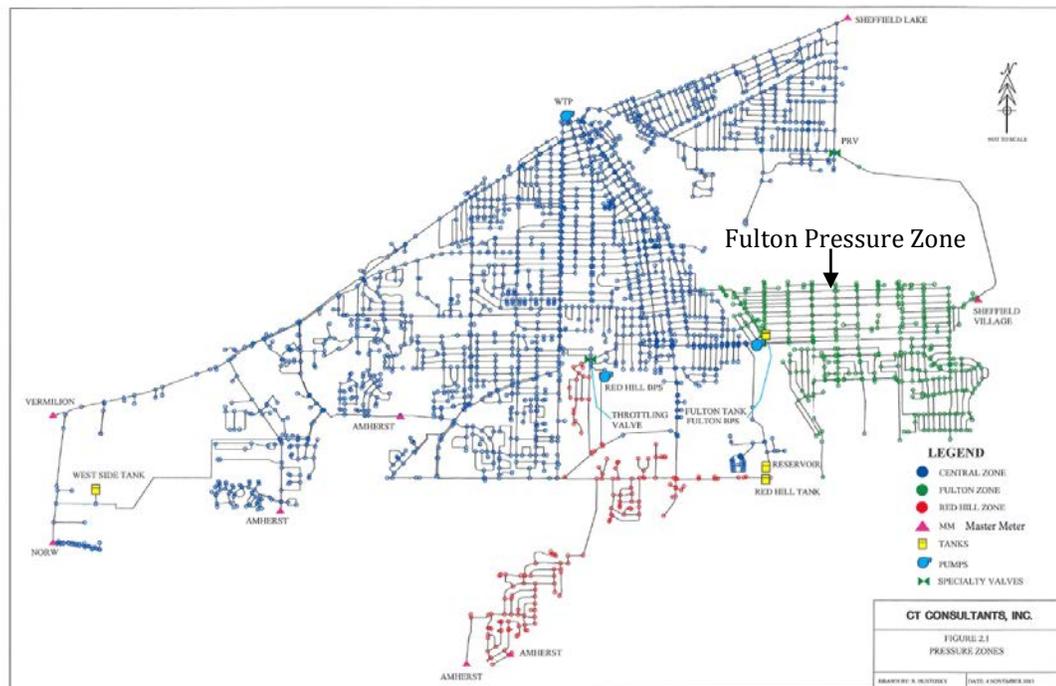


Figure 1, Pressure Zones in Lorain, Ohio

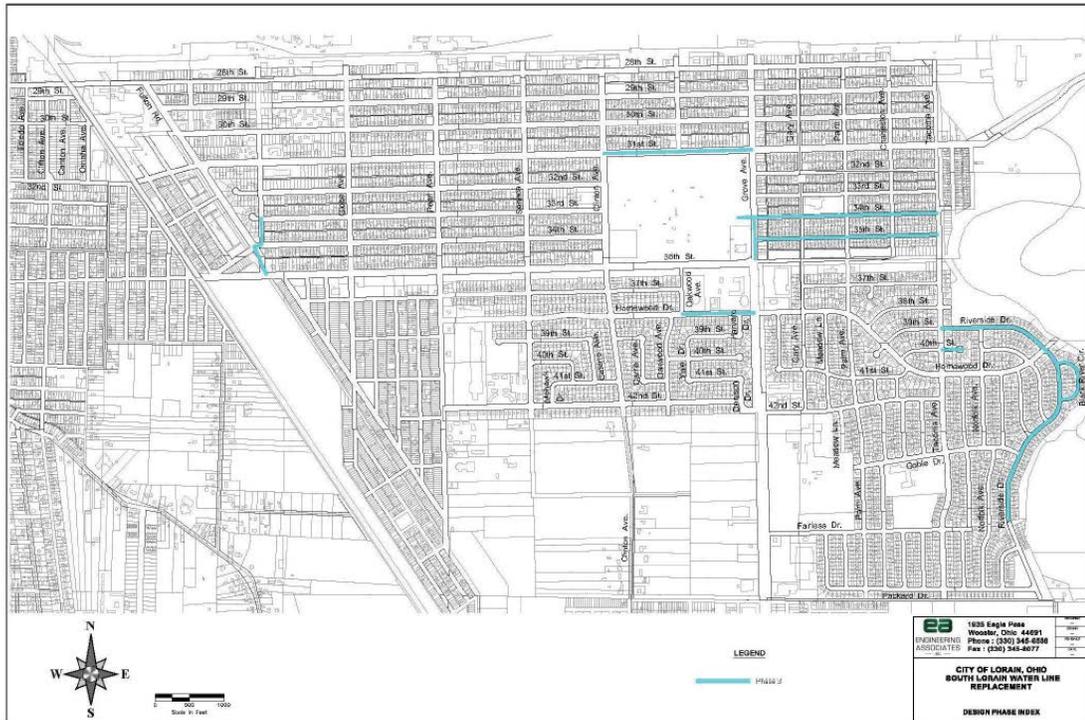


Figure 2, Locations of the Proposed City of Lorain Water Line Replacements

More specifically, the project area is currently served by old water mains (on average over 70 years old) made of steel or cast iron. Some of them are also undersized (6-inch and 7-inch in diameter), prone to frequent breaks, and so cannot meet the city’s 20-year residential and projected fire flow needs. The major streets covered by this proposed project include East 31st Street, East 34th Street, East 35th Street, East 40th Street, Fulton Road, Vine Avenue, Grove Avenue, Homewood Drive, Riverview Drive, and Black River Circle.

As indicated by the city in its project fact sheet, Lorain expects to make the proposed improvements to its water distribution system with Water Supply Revolving Loan Account (WSRLA) financial assistance from Ohio EPA over the next seven to eight months. The city’s main objective is to better serve the area shown above in Figure 2. No plans exist to extend water line service to any undeveloped areas. Rather, the city’s expectation is that the project area will neither grow nor decline in population or water demand over the next twenty years as both have been relatively stable recently.

C. Project Description

After determining that a no-action alternative would not address the problems with its water distribution system in the area presented in Figure 2, the city proposed to replace 17,000 linear feet (lf) of existing 6-inch, 7-inch, and 12-inch diameter steel or cast-iron water lines with new 8-inch and 12-inch diameter polyvinyl chloride (PVC) water lines and appurtenances. The improvements are needed to replace the generally undersized finished water mains and fire hydrants, and to improve their overall reliability to fight fires. As a water line replacement project, the growth aspects of this project are expected to be minimal.

The city has indicated that the cost savings associated with not having to repair water main breaks was the main reason it selected the alternative to replace the existing water mains and appurtenances.

The water line replacements will be located in South Lorain along the following streets: East 35th Street from Tacoma Avenue to Grove Avenue, East 34th Street from Tacoma Avenue to Grove Avenue, Fulton Road from East 34th to East 36th Streets, Grove Avenue from East 34th to East 35th Streets, Riverside Drive from Tacoma Avenue to 1,000' south of Goble Drive, East 40th Street from Tacoma Avenue to eastern terminus, Homewood Drive from Oakwood Avenue to Grove Avenue, Oakwood Park from Clinton Avenue to Grove Avenue, and Black River Circle. New water services will be installed from the water main to the street rights of way as part of this project. Approximately 370 new water services, 15,111 lineal feet of 8-inch diameter water lines, and 1,948 lineal feet of 12-inch diameter water line will be installed. This project will also include 45 new fire hydrants and valves.

According to the city's consultant, this project is meant to handle existing and expected future water demand. All the proposed improvements will be made within prior disturbed road rights-of-way, and a small portion of eastern Oakwood Park. By replacing the existing water lines within its distribution system, Lorain expects the South Lorain area will have a more reliable network of finished water mains.

The city originally estimated that planning, design, and construction of this project would cost about \$3,888,800 of which \$3,795,000 is for construction. Only WSRLA loan and city funds will be used to cover the costs of the proposed water line replacement project. The lowest recently received as-bid costs were \$3,153,843.

D. LER Criteria

Because the proposed project meets certain minimum conditions, and will not individually, cumulatively over time, or in conjunction with other federal, state, or private actions have a significant adverse effect on the quality of the human environment, a LER is warranted. More specifically, these conditions cover actions in communities with public water systems that are for minor upgrading and/or minor expansion of existing water treatment or distribution facilities.

In this specific case, the proposed action involves replacing parts of the existing water distribution system in South Lorain. As all of the proposed improvements will be limited to previously-disturbed locations, the proposed seven- to eight-month long construction period is expected to confer no short- or long-term adverse environmental impacts.

The proposed project meets the following specific criteria for a LER:

- 1. The proposed project has no potential for associated significant adverse environmental impacts and will have no effect on high value environmental resources.** Given the proposed project's limited scope, placement in a previously-disturbed location in an urbanized area, and the absence of any notable natural features within the immediate project area shown in Figure 2 and Figure 3 (see below), the proposed project will not result in any significant, adverse, direct

Concerning the installation of replacement water mains in the city's Oakwood Park, the city's consultant has designed the proposed construction work to avoid the most significant trees and floodplain resources in the area. In this way, the proposed project appears to be consistent with the city's concept plan for Oakwood Park as shown below in Figure 4. Consequently, no significant, indirect impacts on these features or from additional storm water runoff to area water resources are expected.



Oakwood Park Master Plan
City of Lorain

3-29-2016



Figure 4, Oakwood Park Concept Plan

2. **The proposed project will not require extensive impact mitigation unique to the assistance proposal.** The proposed work to complete this project is straightforward and does not require any extensive mitigation of environmental impacts, as all the improvements will be made within previously-disturbed developed areas consisting of residential streets, sidewalks, and road rights-of-way in South Lorain and a small portion of the eastern part of Oakwood Park. In that regard, minimal earth-moving activity is associated with these improvements, so that only routine environmental impact mitigation in the form of standard soil erosion and sedimentation controls, spill control, dust control, vehicle emission and noise controls, traffic and safety, tree protection, and adherence to prohibited construction activities is necessary. To address Ohio EPA concerns about disposal of material excavated from the water line trenches, the contractor will provide a spoil disposal plan showing where and how this material will be managed to avoid any significant

adverse off-site impacts (such as from any placement of excavated material or other fill in floodplains, wetlands, or other sensitive areas not previously approved by Ohio EPA for that purpose). Prior Ohio EPA approval is needed before the contractor's site can be used. The city's consultant has estimated that 8400 cubic yards of spoil material will be generated by the proposed project.

According to the city, as the water mains will be located in road rights-of-way and under sidewalks in most areas, roads and sidewalks impacted by the water line construction will be replaced. All disturbed areas will be returned to original (or better) condition. The contractor will also be responsible for protecting any and all existing underground utilities. This project will not require cutting down trees. Within Oakwood Park, the plan is to install the proposed replacement water line using horizontal directional drilling techniques and so avoid tree damage or removal. No stream crossings are included in this project (the nearest small stream – where the 36th Street Ditch and Clinton Avenue Ditch intersect at 36th Street and Grove Avenue – is located south of the proposed water line and so will be avoided).

- 3. The proposed project is cost-effective and not the subject of significant public interest.** In comparison to a no-action option that would leave unaddressed the current concerns with the existing water lines in the South Lorain part of the City of Lorain, the proposed improvements are more cost-effective because of their lower long-term maintenance costs.

Moreover, the proposed improvements in this project are non-controversial because they will not adversely impact the environment, or the rates paid for water in the project area. Please see the Project Implementation (Section E) and the Estimated Project Costs and Proposed Project Schedule (Section F) parts of this document following this section.

Information on the city's public participation activities is presented below.

- 4. The proposed project will not create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of surface or ground waters. It will also 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.** The proposed project will not result in either new, relocated, or additional discharges of wastewater to either surface or ground water on a permanent basis. The main reason for this conclusion is that the city has indicated that no future growth or water line extensions are anticipated to occur after this proposed project is completed. Rather, the water demand and population in South Lorain has reached a stable point reflecting its built-out condition. Thus, no change in the city's existing National Pollutant Discharge Elimination System (NPDES) permits covering its water treatment plant (WTP) and wastewater treatment plants (WWTPs) are expected to occur in response to the increases in water line capacity needed to address area water pressure and fire protection needs. To conclude, the city's water line replacement project will not require an enlarged WTP or WWTP, a relocated outfall of wastewater, or a discharge of additional

pollutants to local surface water resources through unanticipated growth outside of the project area shown in Figures 2 and 3.

Similarly, the fact that this project only involves replacement of existing water lines with minimally-sized (but larger capacity) pipes and appurtenances designed to meet current engineering standards and the city's 20-year overall water supply needs also supports our conclusion that this project does not involve the creation of a new, or support expansion of an existing, source of water withdrawn from either surface or ground waters. Because the city's WTP continues to operate at or below its current 18 million gallons per day (mgd) design capacity, overall water usage and discharge of any wastewater under the city two WWTP's NPDES permit are expected to stay within the current limits of these facilities, and to comply with the applicable NPDES permit limits. For the foreseeable future, the WTP and Lake Erie's capacity is not expected to change and should be able to continue serving the city's more than 23,000 total water customers.

5. **The proposed project 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.** As noted above, the proposed improvements to Lorain's water distribution system are not designed to facilitate future growth in or around the city, but rather to address current and future operational needs. On this basis, the proposed project will not result in any increase in the volume of discharge or the loading of pollutants from the Lorain WWTPs, or permitted to be discharged under the city's two NPDES permits.

6. **The proposed project will not provide capacity to serve a population substantially greater than the existing population.** The proposed water line replacement project will not expand the rated capacity of the city's overall water distribution system. This conclusion was reached because the proposed project consists primarily of replacing existing water distribution facilities with comparable, adequately-sized water distribution lines to serve existing city needs within a fully-developed community in South Lorain. As such, the proposed project will provide capacity to serve only the existing population and not spur unexpected future growth above current levels and water demand. Similarly, the proposed project is not expected to alter the current Clean Air Act attainment status of the city for five of the six major air pollutants (excluding particulate matter of 12 micrograms).

E. Project Implementation

To implement the proposed project described above, the City of Lorain intends to finance the improvements to its water distribution system through a loan from Ohio EPA's WSRLA, a component of the Drinking Water Assistance Fund program. Currently, Lorain qualifies as an Economic Affordability (EA) community that scored enough affordability points to qualify for the lower of either 2% or the Small Community interest rate. Currently, this interest rate is 1.45%.

Given the capital cost of the proposed project, and the interest rate the city expects to receive, the city has documented that its current water enterprise fund balance and water rates will

generate enough cash reserves and revenues to cover the short- and long-term costs of owning, operating, and maintaining its water treatment and distribution systems. Accordingly, under this configuration, no future water rate increases (beyond inflation to cover operating costs) are expected to be needed to finance this project. Assuming the project funding presented above and that the costs are borne by all city residents equally, Ohio EPA expects that the city will save about \$795,433 over this term when compared to a market-rate loan of 3.2% on the total eligible project costs of \$3,860,902. On this basis, no significant, adverse socio-economic impacts on the population served by Lorain's potable water distribution system are expected to result from this project.

F. Estimated Project Costs and Proposed Project Schedule

Currently, the total estimated project cost of the proposed distribution improvements described above is \$3,860,902. To pay for these improvements and related planning, design, and inspection costs, Lorain expects to utilize a \$3,860,902, 20-year, 1.45% interest-rate loan from Ohio EPA'S WSRLA program.

Under the water rates currently in effect in Lorain, an in-town residential customer using on average 685 cubic feet per monthly cycle pays about \$47.15. Expressed as an annual amount, an average water customer currently pays about \$565.80 per year. This fee is equivalent to 1.61% of the city's 2011-2015 median household income of figure of \$35,042 and thus is considered generally affordable for an average residential water customer of Lorain with its population of about 63,778 people and 24,312 residential service connections.

Given the financial information presented above, no significant adverse economic impacts on the local residential users of Lorain's water distribution system are anticipated.

Under the city's proposed project schedule, WSRLA funds are expected to be awarded in March 2018, with construction on the project to start by April 2018 and be completed in seven to eight months (by January 2019).

G. Public Participation and Notice

With assistance from Ohio EPA, the city prepared and distributed a project fact sheet posted on its web site between the middle of August and the middle of September 2017. In addition, the city also notified all its water customers of this project and its intended funding source in a notice placed in its monthly billing statements. According to Lorain's project manager, the city only received two comments during the public comment period on the city's project fact sheet, and they dealt with how the proposed construction would affect resident's sprinkler systems during construction and the expected length of the project. On this basis and due to the project's limited scope, Ohio EPA has determined that no additional public review and comment on the proposed project is necessary, and that all potentially-interested parties have been given adequate opportunity to review and comment on this project and its costs.

Additional information that supports this decision to issue an LER is available for public inspection upon request at the City of Lorain's office located at N 200 West Erie Avenue, 4th Floor - Engineering Dept., Lorain, OH 44052. Ms. Veronica Newsome, Project Manager and

Engineer III, is the city's contact, and can be reached by phone at (440) 204-2003 to answer questions related to this project.

Ohio EPA will also make this LER available on our website (<http://epa.ohio.gov/defa/EnvironmentalandFinancialAssistance.aspx>) under the "What's New" tab in the "WSRLA Documents for Review and Comment" list at the bottom of the page.

H. Interagency Coordination

The proposed project has been reviewed by the following agencies for technical input, or for conformance with legislation under their jurisdiction, and their findings support a LER:

Ohio Department of Natural Resources
Ohio EPA
State Historic Preservation Office
City of Lorain, Department of Building, Housing, & Planning¹
U.S. Fish and Wildlife Service

I. Conclusion

The proposed project is sufficiently limited in scope and meets all applicable criteria to warrant a LER. The planning activities for the proposed project identified no potentially-significant, direct, indirect, or cumulative adverse impacts. The proposed project is expected to have no short- or long-term adverse impacts on the quality of the human environment or on sensitive resources such as air quality, coastal areas, floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species. Ohio EPA expects that the City of Lorain's proposed water line replacement project will enable the city to continue to provide safe and reliable drinking water to its water customers.

J. For further information, please contact:

Kevin Hinkle
Ohio EPA, Division of Environmental and Financial Assistance
P.O. Box 1049
Columbus, Ohio 43216-1049
(614) 644-3712

e-mail: kevin.hinkle@epa.ohio.gov

¹ The City of Lorain reviews projects for impacts to historic properties. Should the contractor uncover any archaeological or historic resources during the project, then coordination with the City of Lorain Department of Building, Housing, & Planning will occur.