



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

JULY 6, 2017

FINDING OF NO SIGNIFICANT IMPACT
TO ALL INTERESTED CITIZENS, ORGANIZATIONS,
AND GOVERNMENT AGENCIES

PARMA'S RIDGE ROAD SANITARY SEWER – PHASE 2 PROJECT
WPCLF LOAN # CS390736-0016

The purpose of this notice is to seek public input and comments on Ohio EPA's preliminary decision that a Supplemental Environmental Study is not required to implement the recommendations discussed in the attached Environmental Assessment of a wastewater facilities plan submitted by the entity mentioned above.

How were environmental issues considered?

The Water Pollution Control Loan Fund program requires the inclusion of environmental factors in the decision-making process. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed alternatives in its review and approval process. Environmental information was developed as part of the facilities plan, as well as through the facilities plan review process and during site inspections. The Agency's preliminary Environmental Assessment found that the project does not require the preparation of a Supplemental Environmental Study.

Why is a Supplemental Environmental Study not required?

Our environmental review concluded that significant environmental impacts will not result from the action. Any adverse impacts have either been eliminated by changes in the facilities plan or have been reduced by the implementation of the mitigative measures discussed in the attached Assessment.

How do I get more information?

A map depicting the location of the project is included as part of the Environmental Assessment. The Environmental Assessment presents additional information on the project, alternatives that were considered, impacts of the action and the basis for our decision. Further information can be obtained by calling or writing the contact person listed in the back of the Environmental Assessment.

How do I submit comments?

Any comments supporting or disagreeing with this preliminary decision should be submitted to me at the letterhead address. We will not take any action on this facilities plan for 20 calendar days from the date of this notice in order to receive and consider any comments.

What happens next?

In the absence of substantive comments during this period, our preliminary decision will become final. The entity will then be eligible to receive loan assistance from this agency.

Please bring any information that you feel should be considered to our attention. We appreciate your interest in the environmental review process.

Sincerely,



Jerry Rouch, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

A. Project Identification

Name: City of Parma, Ridge Road Sanitary Sewer - Phase 2

Address: The Honorable Timothy DeGeeter
Mayor, City of Parma
City Hall
6611 Ridge Road
Parma, OH 44129

Loan No.: CS390736-0016

B. Project Overview

The City of Parma, in Cuyahoga County, has requested financing from the Ohio Water Pollution Control Loan Fund (WPCLF) to eliminate discharges of poorly treated wastewater from failing septic tanks into the city's storm sewer system leading to Big Creek (see Figure 1 on Page 2). This project includes installing new eight-inch diameter gravity sanitary sewers along Ridge Road between Selwick Drive on the north and Craigleigh Drive on the south, after which home sewage treatment systems (HSTS) and small wastewater treatment plants (WWTPs) currently serving 47 residential and buildings will be eliminated.

Parma plans to construct the \$2,261,000 Phase 2 of the Ridge Road sanitary sewer improvements over a twelve-month period with a combination of low-interest WPCLF funds (\$1,848,816), Ohio Public Works Commission (OPWC) grant funds (\$400,000), and local funds (\$100,000). Please see Figure 2 on Page 3 for the specific location of the proposed improvements.

The environmental review conducted by Ohio EPA, indicates that the proposed project will not result in significant, adverse direct or indirect environmental impacts. Mitigation has been proposed by the city to reduce the impacts that were identified. This project will result in water quality benefits to the tributary streams that flow into Big Creek, a tributary of the Cuyahoga River, and provide human health benefits.

Direct environmental impacts during the construction of the privately- and publicly-owned sanitary sewer improvements are expected to be temporary and relatively minor. Specific environmental impact mitigation has been proposed to limit the effects of construction activities on the two streams and wetlands within the project area. Together, avoiding prohibited construction activities and implementing routine impact mitigation should also ensure that construction is consistent with the basis for this draft finding of no significant impact and environmental assessment. Ohio EPA

has therefore concluded that all these proposed improvements are expected to result in improved human health and environmental conditions within the project area.

A thorough property assessment process was completed during the planning for this proposed project. The results of this property assessment process, including hearings and information provided to the public through other means, indicate that the public now generally supports the project and that it considers the costs to be affordable. Based on the material provided by the city, each resident in the project area will be responsible, on average, for an estimated assessment of \$6000 to \$8000 (between \$475 and \$634 per year over twenty years or \$100 per front foot), a connection fee of \$790, a one-time county-levied HSTS abandonment fee of \$100, a county-charged sanitary lateral inspection fee of \$210, between \$3,000 and \$5,000 on average to properly replace an HSTS with a sanitary sewer lateral (including HSTS abandonment costs), a county-levied sanitary sewer operation and maintenance fee of \$2.15 per front footage that appears on each household's property taxes, and a sewer service charge of approximately \$720 per year in 2018 to pay for the operation, maintenance, and replacement (O,M&R) of the city's sanitary sewer system and treatment of wastewater at the Northeast Ohio Regional Sewer District's (NEORS) Southerly WWTP.



Figure 1, Big Creek Watershed Map

Taken together and amortized to result in annual equivalent amounts, these costs are expected to total between \$1529 and \$1849 per year per residential customer, depending on how the private homeowner costs are paid (either in a lump sum or

spread out over 20 years). Expressed as a percentage of Parma's 2010-2014 median household income (MHI) of \$49,568, this post-project annual amortized cost is equivalent to between 3.38% and 3.7%. The annual sewer service charge figure used above is based on a wastewater rate of \$89.60 per 1,000 cubic feet of water use, as will be charged by NEORS in 2018, and the county's annual sewer maintenance fee of \$2.15 per front footage per household.

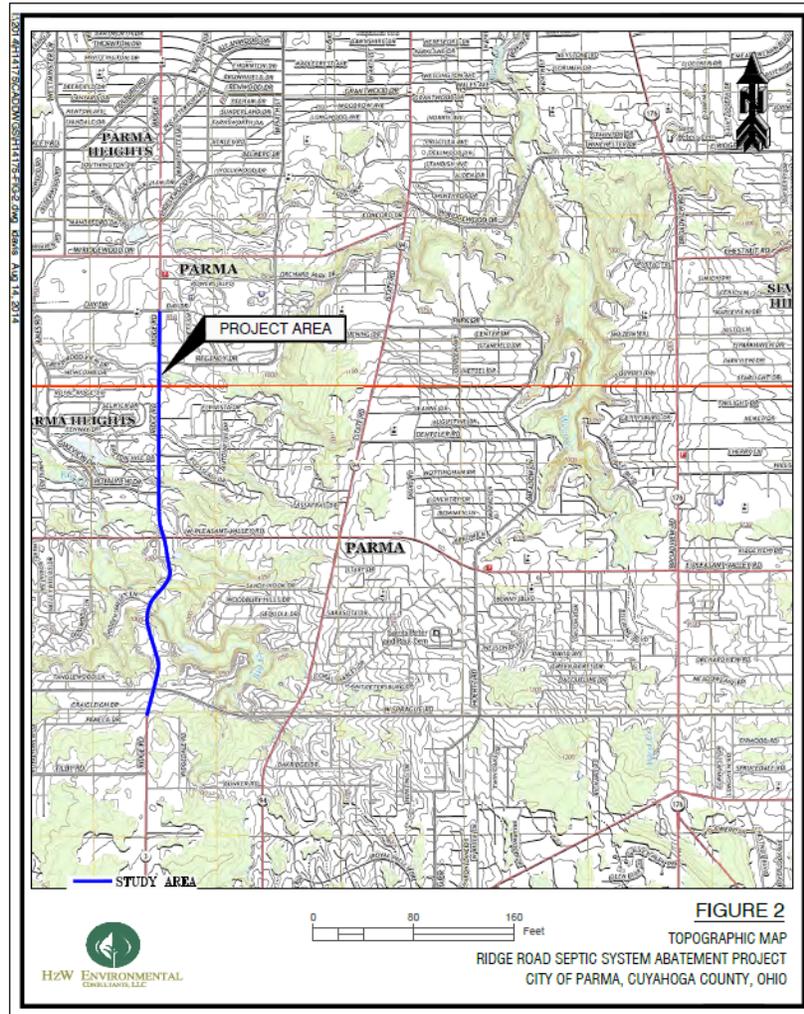


Figure 2, Project Area Topographic Map and Specific Location

C. Project Description

1. Project History

To address the health department's concerns about the project area shown in Figure 2, the city's engineering consultant prepared a project plan and environmental assessment, and submitted them to Ohio EPA's Division of Surface Water in June 2015. There was little additional progress on Phase 2 as the city concentrated on the

construction of Phase 1. With the OPWC's contribution of \$400,000 early in 2017, Phase 2 has risen to the city's top priority among its two final projects to address its remaining HSTS problems.

2. Project Planning

- Unsewered Areas and Existing Needs

All of Parma except the as-yet unaddressed HSTS problem area covered by the 2005 Ohio EPA Director's Final Findings and Orders (DFFO) - Brookdale Avenue, Broadview Road, Old Rockside Road, and Broadrock Court - has sanitary sewers except for the area covered by this proposed project (see Figure 2)

- Population Projections and Flow Projections for This Project

After peaking in 1970 with a population of 100,216, Parma's population has declined by about 19,000 since then, including a loss of about 4.7% during the last decade. The project area has a current population of about 157 people in 49 homes. In May 2016, assuming 2.5 people per household and usage of 100 gallons per capita per day, the city's consultant determined that 46,300 gallons per day (gpd) of wastewater at start-up to 50,700 gpd (in the design year) would be generated by the project area on an average daily basis. From these figures and having determined the capacity of existing downgradient sewers, the consultant chose minimum-size, 8" diameter gravity sanitary sewers to connect to existing sanitary sewers.

3. Wastewater Collection and Treatment Systems

The city's proposed sanitary sewers will convey the collected wastewater to Parma's existing sanitary sewer network and then onto the NEORSD's centralized sewer system and Southerly WWTP.

4. Discussion of Feasible Alternatives

The following discussion analyzes the options considered in the city's planning documents to address the present problems and future needed capacity of its unsewered areas and its wastewater collection system:

- Option 1 - No Action

The no-action option was screened from further analysis since the city would not be able to address the terms of the 2005 DFFOs, or the human health concerns of the Cuyahoga County Board of Health.

- Option 2 - Home Sewage System Improvements

Due to small lot sizes, poor soils, local hydrology, geologic characteristics, connection to existing storm sewers, and other local conditions contributing to HSTS failures, replacing existing HSTS with modern septic tanks and leach fields meeting Cuyahoga County Board of Health requirements, or installation of any other types of on-lot treatment systems, was not deemed feasible. For that reason, this alternative was also not considered any further.

- Option 3 - Collector Sewer Improvements

In its planning materials submitted to various divisions of Ohio EPA between 2005 and 2017, the city and its engineering consultants provided information on different collection system approaches, as well as different alignments and technologies to install the proposed sanitary sewers. Basically, these options involved the use of either Alternative 1, open cut trench gravity sanitary sewers, or Alternative 2, low-pressure force mains and grinder pumps.

Alternative 1 – The main advantages of gravity sanitary sewers are that they do not need specialized equipment for operation and only require minimal maintenance. However, a significant disadvantage is the cost of deeper excavations to maintain the downhill gradient and to provide service to basements without pumping. The range of elevations along the proposed alignment will require several sections of the gravity sewer to be installed by directional boring due to the depth.

Alternative 2 – This option consists of low-pressure force mains and grinder pumps. With low-pressure systems, wastewater flows by gravity to a basin on the lot from which it is pumped into a small diameter, low-pressure main. An advantage of this option is that the sanitary sewer pipe can be installed following the topography, since the flow is moved by small grinder pump stations and is not dependent on gravity. Thus, trenches can be as shallow as four feet deep and at less cost. The disadvantages of this option are less flexibility for connecting new customers, power for operation, maintenance of the grinder pumps, and odors. Odors can be a problem with this alternative because the force mains only flow when the pumps need to run, allowing anaerobic conditions to form in these stagnant situations. With the release of pressure or discharges to open air, odors could be present. Higher O,M&R costs are also a consideration.

In addition to higher replacement costs, possible electrical outages and the need for backup generators also can be associated with Alternative 2 that are not associated with conventional gravity sanitary sewers. In contrast, gravity sewers typically can have higher initial installation costs, but very low annual O,M&R costs.

5. Selected Alternative

Using the analysis conducted as part of planning and detail design work, the city selected alternative 1 for the areas comprising Phase 2. This project includes the construction of new 8-inch gravity-fed sanitary sewer along Ridge Road within road rights-of-way and acquired easements.

To correct the problems identified with the HSTS in the Phase 2 area, Parma has proposed to install approximately 6,000 lineal feet (lf) of eight-inch diameter gravity sanitary sewer line and manholes within the existing right-of-way of Ridge Road from its intersection with Selwick Drive to its intersection with Craigleigh Drive at a depth between 10 and 15 feet and within a trench width of 4 feet. In addition, the city has proposed to install 62 six-inch diameter lateral connections between the gravity sewer riser and the edge of rights-of-way, an asphalt overlay on Ridge Road in 2018, and other appurtenances (driveway removal/replacement, topsoil, and seeding). Private property owners benefitting from this project will need to install privately-owned house laterals from the house foundations to the publicly-owned laterals at the intersection with the public rights-of-way. Further information on this proposed project can also be found in the permit-to-install issued by Ohio EPA's Northeast District Office in September 2016.

In terms of potential environmental impacts, the proposed Phase 2 wastewater improvements along Ridge Road will entail effects similar to those encountered during Phase 1. Generally, temporary traffic disruption, site clearing, and tree removal will be the most visible impacts in the project area. Residents should also expect to see and hear the movement of heavy equipment through their neighborhoods, along with the likelihood that city streets will occasionally become muddy as trucks move through a frequently traveled portion of Parma. Overall, Ohio EPA expects that the impacts associated with the construction of this project can be satisfactorily mitigated by provisions in the contract documents.

D. Project Implementation

The total as-bid construction cost of this project, excluding prior paid-for planning and design costs, currently is \$2,261,000. Of this amount, the city expects to finance a maximum of roughly \$400,000 of the construction costs with grant funds from the OPWC and \$100,000 in local funds. The remainder will be provided by a \$1,860,777 low-interest WPCLF loan at a standard interest rate payable over 20 years. WPCLF interest rates are set monthly schedule to reflect market conditions. For the month of July 2017, the interest rate is 2%.

Currently, the city expects to follow the schedule below for completing this project:

<u>Activity</u>	<u>Date</u>
Advertisement of Phase 2 for Bids	Done (May 17 and 24, 2017)
Open Phase 2 Bids	Done (June 7, 2017)
Initiation of Phase 2 Construction	August 2017
Completion of Construction of Phase 2	By July 31, 2018

Parma expects to receive a WPCLF loan in July 2017. Construction of this proposed project is expected to take twelve months to complete.

A thorough assessment hearing process was completed for this project in March 2017. At the final assessment hearing, five property owners in the project area filed letters of objection with the assessment equalization board. These concerns were addressed during the board's four meetings by collecting information on the appeals and ruling that four of the appeals were not proper. One assessment was lowered to reflect the actual assessed value of the property, and another may be lowered pending completion of negotiations between the property owner and the West Creek Conservancy.

As a result of the city's proposed funding and repayment mechanisms, no additional increases in sanitary sewer service charges beyond those already scheduled are expected to be needed to finance this proposed project and its associated debt. Based on the estimated total project costs, the city expects the current estimated total annualized private homeowner costs ranging from \$810 to \$1130 per year per household when added to Parma's average annual sanitary sewer fee of \$720 per year will be sufficient to cover the annualized debt. The total post-project annual amortized wastewater cost is equivalent to between 3.38% and 3.7% of the local median household income, \$49,568. The OPWC grant funding and low-interest financing from the WPCLF help make these improvements as affordable as possible. Table 1 provides a financing summary of all the proposed improvements.

Table 1, City of Parma Ridge Road Sanitary Sewers Project Financing Summary	
Item	Cost
Total Estimated Construction Costs, including contingencies	\$2,260,777
Estimated OPWC Grant Funds	\$400,000
Estimated WPCLF Loan at 2%	\$1,848,816

Table 1, City of Parma Ridge Road Sanitary Sewers Project Financing Summary	
Item	Cost
Estimated New Annual Debt Retirement – WPCLF Payment	\$56,307
Pre-project, Annual Residential Sewer Service Rate (2017) based on 60,000 gallons usage.	\$678 per year
Post-project, Annual Residential Sewer Service Rate (2018) based on 60,000 gallons usage.	\$719 per year
Notes: The City provided the following other relevant information:	
1. Average Residential Homeowner Assessment: \$6,000 to \$8,000 based on a total assessment of \$461,714 for the project. 2. WPCLF loan will be repaid through special (property) assessments and general tax receipts (405 account funds).	

E. Environmental Impacts of the Selected Alternative

The proposed solutions to the water quality problems in the project area discussed in this document involve new sanitary sewers and elimination of failing HSTS. Because of lack of important environmental features, the project scope, and the detailed mitigation developed by the city’s consultant, Ohio EPA expects the proposed wastewater improvements will not directly result in significant adverse effects on the natural or human environment. Potential direct or primary impacts on any resources are described below.

In addition, the project was reviewed by Ohio EPA’s Division of Environmental and Financial Assistance for indirect or secondary impacts on the environment. Where pertinent, an explanation has been provided below that describes the current condition of proposed development areas and why no significant adverse environmental impacts from this development within Parma’s project planning area are expected. Overall, this proposed project is not expected to result in any significant, adverse environmental impacts for the reasons cited below.

1. Major Land Forms

Given that the purpose of the city’s proposed project is mainly to replace failing HSTS with more reliable centralized sanitary sewers of adequate capacity within generally previously disturbed road rights-of-way and easements, no significant changes in major land forms (unique topographic features or soils) are expected.

2. Surface and Ground Water

The proposed placement of the project’s sanitary sewer components within mostly previously-disturbed areas of Parma and the limited amount of construction

activities that will be conducted near small streams and wetlands in the project area indicate that there should not be any significant, adverse, direct environmental impacts on surface water resources within the planning area. The contractor will implement a storm water pollution prevention plan and install specific best management practices (e.g., inlet protection, silt barriers, and temporary/permanent seeding) to minimize construction related adverse water quality impacts. Ohio EPA expects that the proposed project will not result in significant, adverse, direct impacts on area surface water features. No stream crossings are proposed as part of the sanitary sewer improvements included in this project. Two small crossings are proposed however as part of the city's more extensive proposed water main improvements that it will finance with local funds.

Ohio EPA and the Northeast Ohio Areawide Coordinating Agency (NOACA) support the conclusion that this project is consistent with the objectives of water quality planning under the Clean Water Act. These assurances also indicate that any projected future growth in Parma's project planning area should not induce adverse indirect environmental impacts on air quality. As this project is entirely within NEORSD's Southerly WWTP service area, a Clean Water Act Section 208 Areawide Water Quality Planning review on this project was not needed, so the city's activities are consistent with regional plans for water quality.

No significant, adverse, direct effects on ground water resources are anticipated because residents of the project area are served by the City of Cleveland's public water supply and distribution system. Thus, installation of the sanitary sewer and any trench dewatering should not affect any private wells in the vicinity of the project. In addition to no direct effects, the proposed project should also not indirectly affect any ground water resources through either related infrastructure improvements or property development.

3. Terrestrial and Aquatic Habitat, including Endangered Species, Floodplains and Wetlands

Terrestrial Habitat. Given the location of the proposed sanitary sewer improvements, limited street tree removal, if any, is expected to be needed during this project's construction. Selective tree cutting would take place between October 1 and March 30 to avoid impacts to any habitat suitable for Indiana and northern long-eared bats. On this basis, Ohio EPA has concluded that the proposed project will have no adverse impact on either bat species or their habitat covered under the federal Endangered Species Act. The proposed project area lacks any habitat specifically known or capable of supporting federal- or state-listed potentially endangered or threatened species. On this basis, Ohio EPA has concluded that no direct, indirect, or cumulative impacts on any additional rare, threatened, or endangered species are likely to occur in response to the proposed improvements.

Aquatic Habitat. No stream crossings are proposed as part of the city's sanitary sewer improvements. By adhering to specific prohibited construction activities (such as not placing fill in any wetlands or floodplains even with the permission of property owners) and following the storm water pollution prevention plan, only minor, acceptable levels of storm water runoff are expected to occur. This proposed project should have a positive benefit for human health conditions and enable downstream water quality to improve with no long-term, indirect and cumulative impacts

4. Land Use and Agriculture

Based on a review of the project area, Ohio EPA concluded that the proposed wastewater improvements will have no significant direct, indirect, or cumulative effects on either land use or agriculture production because of their location within a largely urbanized area, as well as the built-out condition of developable properties within the project area. Zoning in the project area is generally residential and retail.

5. Air Quality

Air pollution levels in Parma mirror the conditions in Cuyahoga County. Since the entire county is currently in non-attainment for fine particulates (PM 2.5), Ohio EPA has reviewed the proposed project for direct and indirect impacts on air quality. Construction air quality impacts, including from fugitive dust, will be temporary and minor.

Considering the generally built-out condition of the project area and the minimum pipe size used on this project and thus its relatively low growth potential, very little, if any, additional air pollutants are expected to originate within the proposed project area. For that reason, no significant, adverse indirect and cumulative impacts on air quality are expected.

Ohio EPA and NOACA support the conclusion that this project is consistent with the State of Ohio's State Implementation Plan under the Clean Air Act. A positive benefit of this project will be the elimination of odors associated with failing HSTS and package WWTPs within the project area.

6. Noise, Traffic, and Aesthetics

The contract specifications for this project provide adequate mitigation to address potential short-term noise, traffic, and aesthetic concerns. Keeping construction equipment properly operating, following a required traffic maintenance plan, and preventing construction activity during evening and nighttime hours, will prevent significant, direct project effects on noise, traffic, and aesthetics. Overall, noise levels and traffic patterns are expected to return to pre-construction levels once this project is completed. However, one of the unavoidable long-term aspects of this project is

minor, selective tree removal along city roads and within permanent and temporary construction easements in association with the city's water line improvements. More information on tree removal within the project area can be found above in the terrestrial and aquatic habitat portion of this document. In addition to this potential concern, the city has taken steps to design this project to avoid private landscaping as much as possible.

7. Energy Use

Given the absence energy usage to operate the city's proposed gravity collector sewers, no significant short- or long-term adverse effects on the production of non-renewable energy or the air pollution it produces are expected. In addition, the energy (in the form of fossil fuels) needed to operate the equipment to install the proposed gravity sewer is expected to be comparable to that used on similar projects, and thus not to constitute a short-term adverse environmental impact. Upon completion of the proposed project, energy usage will return to pre-construction levels and no long-term energy needs will exist.

8. Archaeological and Historic Resources

A review by the State Historic Preservation Office found that the city's proposed project does not have any potential for affecting archaeological or historical resources in the facilities planning area listed in, nominated to, or eligible for the National Register of Historic Places. Ohio EPA concurs with this finding. On this basis, any direct or indirect impacts on these types of resources should not be adverse.

9. Local Economy

The local economy of Parma and its declining population has been influenced by the conditions of its commercial and residential sectors. Given these conditions, the rest of this section deals with the city's population trends and how the city's funding proposal can assist with making these proposed capital improvements more affordable for city residents.

Over the past thirty years, the city's population declined from a peak of 100,000 people. Community demographics show that its median household income is now about \$50,000, while 18.3 percent of its population is over age 65 and 11.2% is beneath the poverty levels. To help these latter segments of the city's population afford the improvements to the city's wastewater collection system, the city received a maximum of \$400,000 in OPWC grant funds to help lower the capital costs of this project and the property assessments. It should also be noted that the WPCLF 2% standard interest rate loan and OPWC grant funds will further reduce the costs of this project when compared to market rate loans. This fixed interest rate will be in effect through July 2017, when a new monthly interest rate will be set. Ohio EPA expects

that Parma will save its residents about \$276,500 by using the WPCLF program when compared to a 3.25% market rate loan.

Besides the direct construction costs paid by Parma residents in the project area, the NEORSD wastewater bill is scheduled to increase over the next several years. As the city's proposed project costs are just part of its overall wastewater bill (the remainder comes from paying a portion of operating NEORSD's Southerly WWTP costs), future debt service and operations costs from NEORSD are paid by Parma residents as well. At this time, however, Ohio EPA does not expect that the city will need to further raise its wastewater rates to avoid annual wastewater account deficits during the next twenty years. On this basis, current support of city residents to finance this project suggests that the proposed assessments, tap-in fees, inspection fees, HSTS abandonment and sewer lateral construction costs, and wastewater charges when combined and amortized to reflect an annual equivalent cost should be affordable for an average resident of the city.

F. Public Participation

The proposed project has been reviewed by the following agencies or for conformance with laws under their jurisdiction. Where the agencies were directly contacted, they were provided an opportunity to comment on the proposal to finance construction activities in the City of Parma using WPCLF and other funds.

- * NOACA
- * Ohio Department of Natural Resources
- * Ohio Environmental Protection Agency
- * State Historic Preservation Office
- * U.S. Fish and Wildlife Service

During the environmental review of this project, the city and its consultants coordinated fully with federal and state review agencies. No negative comments about the proposed improvements were received from these review agencies.

In addition, Parma completed a thorough public notification and involvement process. This process included sending certified letters to project area residents notifying them of the special assessment amount for their property and holding public meetings during the facilities planning phase of project development in 2015, plus following the required special assessment process in early 2017 during which project area residents could provide comments. Records from the assessment equalization board hearing in February 2017 and city council's action to approve the board's recommendations in mid-March 2017 indicate that residents' main concerns dealt with individual assessment amounts. Given that these concerns were addressed, it appears that the city provided ample opportunities for local area residents to have their questions answered during the multiple available public review and comment periods on this project. Accordingly, Ohio EPA has concluded that the public participation requirements of the WPCLF program were met and that

the city has appropriately involved the public in the decision-making process for this project.

G. Reasons for a Preliminary Finding of No Significant Impact

Based upon our review of the city's facilities planning information and the materials presented in this Environmental Assessment, Ohio EPA has concluded that there will be no significant adverse direct impacts from the proposed project as it relates to the environmental features discussed previously. Through avoidance of the most environmentally-sensitive areas and the use of mitigative measures described in this document, the impacts from construction should generally be short-term and insignificant. Any indirect or cumulative impacts from this project should be addressed by on-going local initiatives to implement comprehensive planning ideas and storm water controls, as well as enforcement of existing federal and state regulatory frameworks under the federal Clean Water Act and existing state law.

H. For further information, please contact:

Kevin Hinkle
Ohio Environmental Protection Agency
Division of Environmental and Financial Assistance
Office of Financial Assistance
Technical Review Section
Environmental Planning Unit
50 West Town Street, Suite 700, P.O. Box 1049
Columbus, Ohio 43216-1049
Phone: (614) 644-3712
Fax: (614) 644-3687

Email: kevin.hinkle@epa.ohio.gov