



September 30, 2024

Limited Environmental Review and Finding of No Significant Impact

**City of Parma – Cuyahoga County
Krueger Avenue Area Sewer Improvements Phase III
Loan number: CS390736-0028**

The attached Limited Environmental Review (LER) is for a sanitary sewer improvement project in Parma which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Pollution Control Loan Fund (WPCLF) 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,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Krueger Avenue Area Sewer Improvements Phase III

Applicant: City of Parma
6611 Ridge Road
Parma, Ohio 44129

Loan Number: CS390736-0028



Figure 1. Cuyahoga County

Project Summary

The City of Parma has requested \$1,750,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) to fund the Krueger Avenue Area Sewer Improvements Phase III project. The project involves constructing a relief sewer from Krueger Avenue to State Road along Torrington Avenue and Milford Avenue to improve sewer capacity and address reported basement backups (BBUs). This project is eligible for full principal forgiveness, which is a loan that will not need to be repaid.

History & Existing Conditions

The City of Parma, in Cuyahoga County (see Figure 1), has a population of 80,880 and the Northeast Ohio Regional Sewer District (NEORS) Southerly Wastewater Treatment Plant (WWTP) takes the city's sanitary sewage flows. In January 2022, the NEORS completed the Southwest Interceptor - Local Sewer System Evaluation Study (SWI-LSES) to address sanitary sewer infrastructure problems that adversely affect human health and the environment. These problems include sanitary sewer overflows (SSOs), sanitary sewer system BBUs, common trench sewer crossflows, illicit discharges to separate storm sewers, and failing household sewage treatment systems (HSTS). Within the SWI-LSES, numerous locations of various infrastructure issues were identified.

A total of 1,986 people will be served by this project. Common and separate trench sewers exist in the project area. The common trench sewer lines were primarily constructed prior to 1960 and consist of a storm sewer being above the sanitary sewer in the same trench. Two separate manholes provide independent access to the storm and sanitary sewers. Although there is no direct hydraulic connection between the storm and sanitary sewer pipes, there is an increased potential for stormwater exfiltration entering the sanitary sewer system.

The BBUs in the project area are mostly caused by high infiltration (excess water from leaking pipes and connections) and inflow (excess water from improper connections to the sewer system) and limited sewer capacity downstream of the project area. A total of 187 reported BBUs occur in the catchment area of tributary to Stickney Creek (project area). Replacing the sewers will not fix the overall problem in the conveyance system, as it will just move the BBUs downstream. Additionally, the project area is crowded with sanitary and storm sewers, as well as utilities and other infrastructure;

therefore, upsizing the existing collection system is unfeasible as the storm sewer would need to be realigned.

Constructing new sanitary sewers underneath the existing system is the most feasible alternative. The new sanitary sewer pipes will connect to the existing sanitary system to allow all sanitary flow into the new conveyance system. This will provide enough volume to take care of the existing flow and infiltration and inflow (I/I) without causing BBUs within the project area and will not add stress to the downstream collection system.

Project Description

The project involves constructing a relief sewer from Krueger Avenue to State Road along Torrington Avenue and Milford Avenue (Figure 2). A total of 14 linear feet (LF) of 8-inch PVC sanitary lateral pipe, 593 LF of 12-inch PVC sanitary sewer pipe, 723 LF of 15-inch PVC sanitary sewer pipe, and 2,186 LF of 18-inch sanitary sewer pipe will be laid underneath the existing sanitary sewer, connected with the new manholes.

Implementation

The City of Parma is eligible for the full loan amount in principal forgiveness (loan amount that does not need to be repaid) from the Ohio WPCLF. With this favorable financing, Parma will save \$2,509,796 compared to financing the entire loan amount at the market rate, 3.78%, for a 20-year loan period. The total project cost is \$3.5 million; the rest of the project's construction costs will be covered by Northeast Ohio Regional Sewer District Member Community Infrastructure Program (NEORS D MCIP) funding.

The city indicated that no rate increases are specifically associated with this project. The average monthly residential sewer bill will increase from \$10.75 in 2023 to \$15.75 in 2026. The annual sewer bill in 2023 was \$129 which is 0.2% of the median household income for Parma (MHI; \$60,590) and is less than the Ohio average annual sewer bill of \$489.95.

Loan award is anticipated in October 2024, and construction is expected to be completed by May 2025.

Public Participation

A total of four community meetings were held with Parma. The first meeting was held with Parma representatives on September 12, 2019, at Parma City Hall. The meeting provided an overview of the LSSSES project and summarized findings by showing field and model-projected results. A second meeting was held online on March 19, 2020, to summarize potential MCIP projects in the Krueger Avenue and Green Acres Drive areas. A subsequent virtual meeting was held on March 10, 2021, to review preliminary findings and potential improvements in the Krueger Avenue and Green Acres Drive areas. A final virtual meeting was held on October 26, 2021, to review the project findings, potential solutions, and draft community report.

The project was also discussed during city council meetings. The city's website allows for review of city council agendas, meeting minutes, meeting videos, and legislation that has been passed to provide the residents the ability to participate without attending the council meetings. Additionally, project updates are posted on the city's website, and the local newspaper has been used to notify the public of the project.

Ohio EPA is unaware of any concerns or opposition to this project. Ohio EPA will make a copy of this document available to the public on the following webpage and can provide it upon request: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements>.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater collection system, which involves the functional replacement of and improvements to existing infrastructure. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will require no specific impact mitigation and will have no effect on high-value environmental resources. Construction will take place in existing rights-of-way in developed residential locations that lack important environmental resources. Standard construction best management practices will minimize noise, dust, erosion, sediment, and traffic disruptions.

Is cost effective. Replacing and rehabilitating the existing sewers as well as a do-nothing alternative are not valid alternatives as one is far too costly and neither would be fixing the issues presented by the existing conveyance system.

Is not a controversial action. By obtaining WPCLF full principal forgiveness, Parma has reduced potential loan costs substantially to minimize sewer bill impacts. Ohio EPA is unaware of any controversy about or opposition to this project.

Does not create a new, or relocate an existing discharge to surface or ground waters, and 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. No new or increased discharge will occur because of this project.

Will not provide capacity to serve a population substantially greater than the existing population. The improvements are not related to serving new growth or increasing capacity at the wastewater treatment facility.

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

The proposed project is a cost-effective way to address necessary improvements to existing infrastructure. Once implemented, improving the sanitary sewer capacity and reducing I/I into the sanitary sewer system will also eliminate basement backups, protecting the health of residents within the area.

Contact Information

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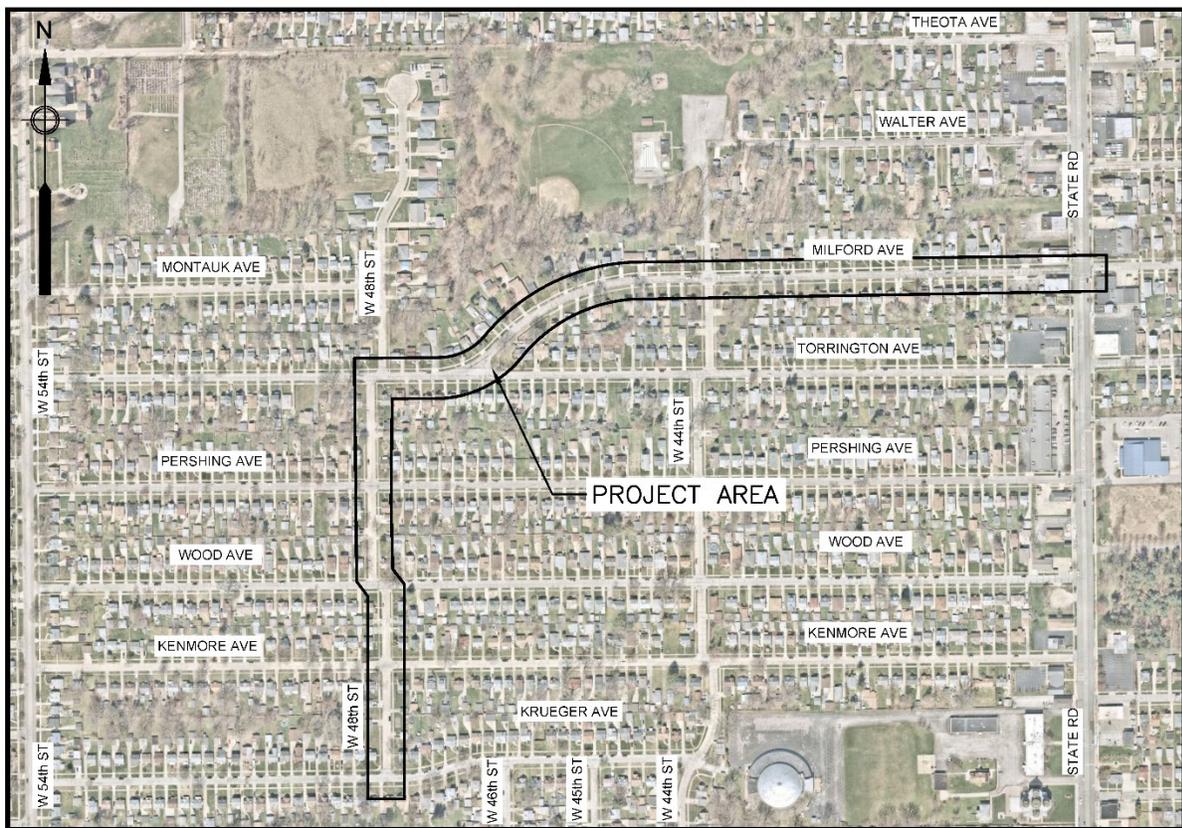


Figure 2. Phase III project area