



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

7/9/2018
Preliminary Finding of No Significant Impact
Akron – Uhler Conveyance (Rack 27 and 29)
Summit County
WPCLF CS390095-0161

The attached Environmental Assessment (EA) is for a sewer infrastructure improvement project in your area which the Ohio Environmental Protection Agency intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The EA describes the project, its costs, and expected environmental benefits. We would appreciate receiving any comments you may have on the project. Making available this EA and seeking your comments 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 WPCLF program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. More information can be obtained by contacting the person named at the end of the EA.

Any comments on our preliminary determination should be sent to me at the letterhead address. We will not act on this project for 30 calendar days from the date of this notice in order to receive and consider comments. In the absence of substantive comments during this period, our preliminary decision will become final. After that, Akron can then proceed with its application for the WPCLF loan.

Sincerely,

A handwritten signature in blue ink that reads "Jerry Rouch".

Jerry Rouch, Assistant Chief
Division of Environmental & Financial Assistance
Office of Financial Assistance

JR/DH

attachment

ENVIRONMENTAL ASSESSMENT

A. Project Identification

Name: Akron – Uhler Conveyance (Rack 27 and 29)

Address: Daniel Horrigan, Mayor
City of Akron
166 South High Street
Akron, Ohio 44308

WPCLF #: CS390095-0161



B. Proposed Project

1. Summary

The City of Akron (Akron) in Summit County has requested financial assistance from the Ohio Water Pollution Control Loan Fund (WPCLF) to improve the sanitary sewer infrastructure and reduce combined sewer overflows into the Little Cuyahoga River. The Uhler Conveyance Rack 27 and 29 improvements project will increase the dry weather flow capacity by enlarging the underflow pipes at Rack 27 and Rack 29 to 30 and 36 inches, respectively. Updates include the replacement of existing infrastructure and installation of new sanitary and storm sewers along Cuyahoga Street and Uhler Avenue. The proposed project will include a new sanitary sewer aerial crossing of the Little Cuyahoga River near Memorial Parkway and the removal of the existing sewer crossing concrete structure in the Little Cuyahoga River.

Construction is scheduled to begin in September 2018 and be completed by September 2019. The total estimated project cost is \$6,855,000, which Akron plans to borrow from the WPCLF at a below-market interest rate.

This loan allows Akron to cooperate with the Stark County Park District through the Ohio Water Resource Restoration Sponsor Program (WRRSP) to provide \$1,675,500 for purchase and protection of 184 acres of Nimisila Creek Preserve Phase 2, an important water resource-related habitat including 95 acres of Category 3 wetlands in New Franklin (Summit County) and Lawrence Township (Stark County). More information on the WRRSP project is available from the contact named at the end of this document.

2. Project Background

a. History and Existing Conditions

Akron has combined sewers (pipes that in dry weather carry sanitary sewage only, and during wet weather carry sanitary flows combined with storm drainage) in much of the city. When flows rise dramatically during and after rainfall, combined sewer overflow (CSO) structures divert untreated sanitary sewage mixed with storm water to area streams. Such discharges are threats to human health and the environment.

Due to these historical and ongoing CSO events, Akron is currently implementing requirements set forth by a US Environmental Protection Agency (USEPA) Consent Decree. The Uhler Conveyance Rack 27 and 29 improvements are a component of Akron's CSO program.

Currently, Rack 27 and 29 flows are conveyed in combined sewers to the existing CSO Rack 27/29 regulator structure. Dry weather flow passes through the rack into an underflow pipe and connects to the Little Cuyahoga Interceptor Sewer. During a wet weather event, flows overtop a weir and are conveyed through an overflow sewer to the Little Cuyahoga River. Upsizing the Rack 27 and 29 underflow pipes will provide capacity to convey the typical year flows.

Rack 27 is a CSO regulator structure that conveys dry weather flow to the Little Cuyahoga Interceptor (LCI) Sewer located on the opposite side of the Little Cuyahoga River. The underflow pipe that carries the dry weather flow is a 15" concrete encased vitrified clay pipe that crosses the bottom of the river channel. The overflow pipe is a 39" brick sewer that outlets just north of the Memorial Parkway bridge.

Rack 29 is a CSO regulator structure that conveys dry weather flow to the Northside Interceptor Sewer via Rack 30 and Cuyahoga Street. The underflow pipe that carries the dry weather flow is a 12" vitrified clay pipe. Flows from Rack 29 are re-regulated at Rack 30 during wet weather flows and diverted to the Cuyahoga Street Storage Basin for temporary storage before re-entering the sewer system. The overflow pipe is a 48" brick sewer that outlets to the Little Cuyahoga River.

b. Population and Flow Projections

The project area is primarily developed, and Akron expects no significant population or economic growth in the project area. The existing sanitary sewers are appropriately sized for the present and expected future flows.

c. Water Quality

Racks 27 and 29 flow to the Little Cuyahoga River. Combined sewer overflows at this

location discharge to the Little Cuyahoga River, which is in attainment of Ohio Water Quality Standards warmwater habitat (WWH). This project will significantly reduce overflows into the Little Cuyahoga River.

Additionally, the removal of the concrete-encased sewer line and remnant bridge pier will allow ecological restoration of the aquatic species in the project area.

3. Discussion of Feasible Alternatives

To meet the requirements of the Consent Decree, Akron must address CSOs. Doing nothing, the “no-action” alternative, will continue to allow overflows into the Little Cuyahoga River and would subject Akron to federal and state penalties and is, therefore, not a feasible alternative.

Storage Basin Alternative

A storage basin was proposed for the storage of Rack 27 and 29 overflows. The proposed basin was anticipated to be located in the northwest corner of the intersection of Memorial Parkway and Uhler Avenue. Flows stored in the basin would be released to the LCI, and infrequent overflows would be diverted to the Little Cuyahoga River.

Other Alternatives

Three other alternatives were considered, as follows:

- 1) Maximizing Green Infrastructure (GI) by constructing bio retention and infiltration basin facilities to capture storm events and attenuate the CSO volume. Modeling results show that GI alone cannot eliminate overflows at Racks 27 and 29.
- 2) Complete sewer separation of existing combined sewers by constructing new sanitary sewers and converting existing pipe for storm sewer only in the CSO Rack 27/29 area. This alternative would be cost prohibitive, with the estimated cost of \$26 million.
- 3) Optimizing conveyance from Rack 27 by upsizing the underflow pipe based on modeled capacity in the LCI and optimizing conveyance from Rack 29 by upsizing the underflow pipe and downstream piping based on modeled capacity at Rack 30 and the existing Cuyahoga Street Storage Facility (CSSF).

Ultimately, based on lower construction costs, Akron opted to proceed with the final proposed alternative with the addition of upsizing the Rack 27 underflow with an aerial crossing over the Little Cuyahoga River and upsizing the Rack 29 underflow.

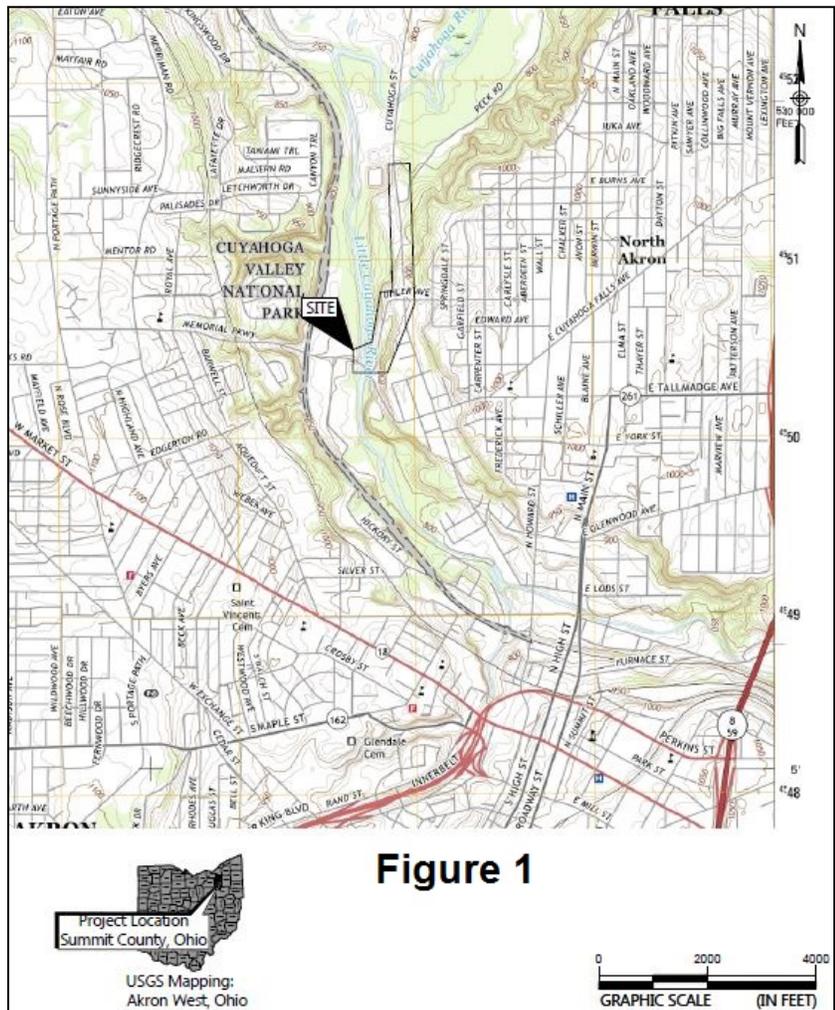
4. Selected Alternative

To eliminate the overflows in a statistical “typical year,” the proposed project will enlarge

the underflow pipe to 30" from Rack 27 to the LCI. A large junction chamber will be required to make the new connection to the LCI. The project will also include separating combined sewers on Uhler Avenue to allow offloading of storm run-off from Uhler Avenue.

Rather than constructing another in-stream channel, an aerial utility crossing will be constructed. The existing in-river pipe and concrete encasement and adjacent but unrelated bridge pier foundation will be removed and river restoration will take place within the project limits.

To eliminate the overflows in a typical year, the proposed project will enlarge the underflow pipe to 36" from Rack 29 to Rack 30. The regulator structure at Rack 29 will be reconstructed. In addition to enlarging and replacing the aging infrastructure on Cuyahoga Street, a new storm sewer will be constructed on Cuyahoga Street. This will allow storm run-off to be offloaded via the storm outlet at Rack 30 (along Cuyahoga Street just north of Peck Road). Figures 1 and 2 show the project location. Figures 3 and 4 show detail of the existing concrete sewer to be removed.



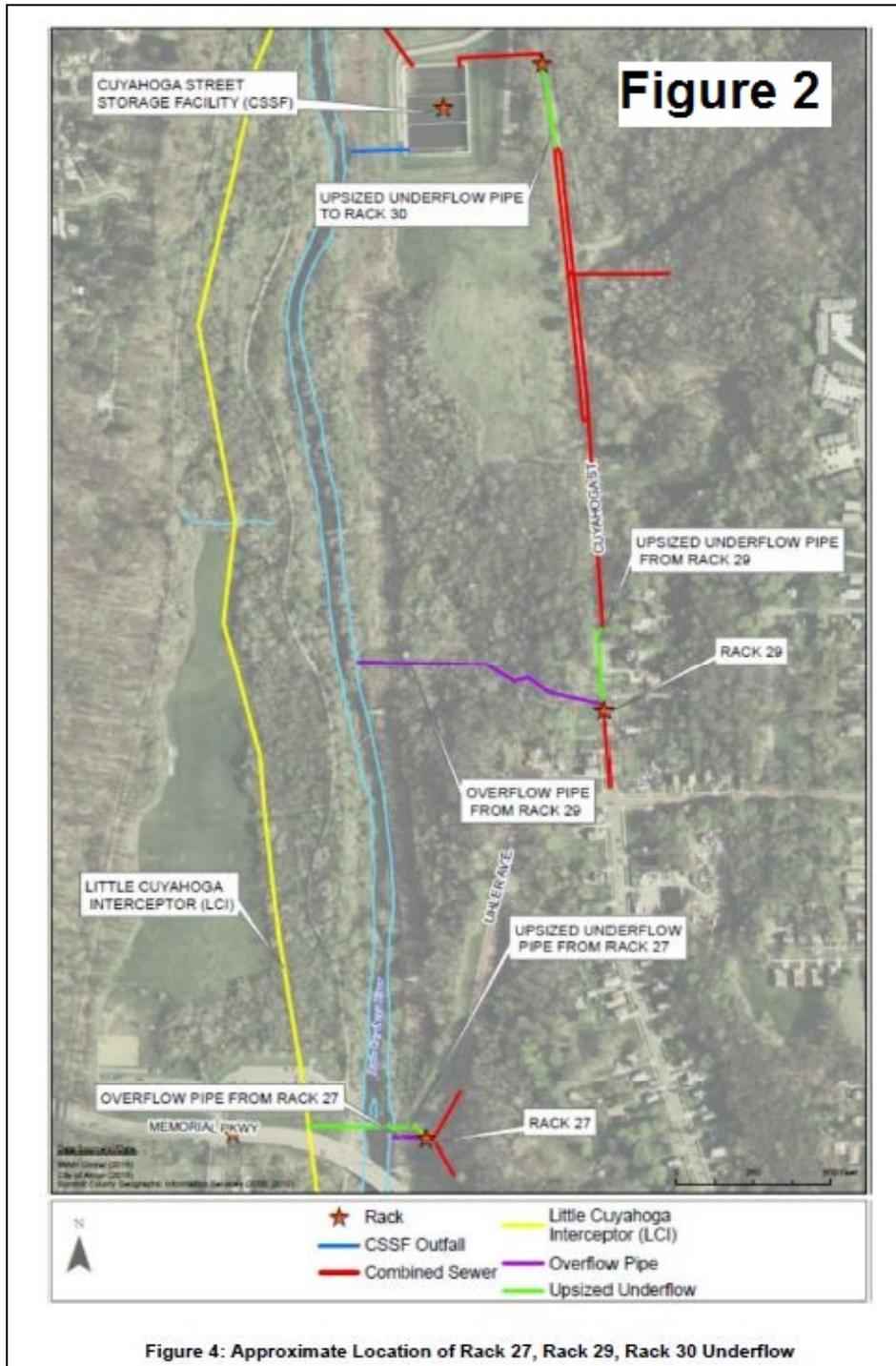


Figure 4: Approximate Location of Rack 27, Rack 29, Rack 30 Underflow



5. Project Implementation

The total estimated project cost is \$6,855,000, all of which will be financed by the WPCLF loan. In exchange for sponsoring the Nimisila Creek Preserve Phase 2 WRRSP project, Akron will receive an interest rate reduction of 0.1% on the standard rate (currently 2.37%; the rate is set monthly and may change for a later loan), giving it a blended rate of 2.27%. During the 45-year loan period, Akron will save approximately \$3,856,219 by using WPCLF dollars at this rate, compared to the market rate of 3.52%.

Construction will begin in September 2018 and be completed by September 2019.

C. Environmental Impacts of the Proposed Project

Construction of this project could affect environmental features. Because the project is designed to better manage existing sewer flows rather than provide additional capacity in the wastewater system for growth, the project is not expected to lead to new development or associated indirect or cumulative environmental impacts.

Major land forms and local topography will not be altered by this project because the project requires only temporary excavations.

Wetland delineations for both Rack 27 and Rack 29 were completed. No wetlands were identified or delineated with the Rack 27 project area. In the Rack 29 project area, 2 wetlands were identified and account for 0.056 acres of wetland onsite. The Ohio Rapid Assessment Method (ORAM) was used to assess both wetlands and they both received a score within the range of a Category 1 wetland, the lowest quality wetland. No work will occur within a specified distance of the wetlands. The contractor will be responsible for placing a silt fence around the wetland perimeter and flagging or fencing the area to ensure it is not disturbed by construction activities.

Permitting required by the U.S. Army Corps of Engineers (USACE) will be acquired to protect surface water resources. A USACE Nationwide permit will be filed for work within the normal high-water level near Rack 27. This permit is for streambank stabilization work and removal of the sewer pipe and old bridge abutment.

Deep excavation is likely to encounter ground water. Provisions for continuous pumping will be required, and consideration will be given to the use of deep ground water wells in deeper excavations. However, due to the absence of public or private water wells in the project area, temporary dewatering is unlikely to significantly affect ground water resources.

Construction will affect terrestrial habitats in the immediate project area, without impacting important plant or animal species. Five federally listed species occur in Summit County: the threatened eastern massasauga rattlesnake, the threatened

northern long-eared bat, the endangered Indiana bat, the threatened northern monkshood, and the species of concern bald eagle. No habitat suited to the eastern massasauga, northern monkshood or bald eagle is in the project area. The Indiana and northern long-eared bats have similar summer maternity and roosting habitat preferences (trees with large crevices or loose, sloughing bark greater than ten feet above the ground). Although the project area lacks trees with these characteristics, tree and vegetation removal will occur from October 1 through March 31 when bats are presumed absent from the area, so no adverse impacts to any of these threatened or endangered species is expected.

A mussel reconnaissance survey was completed in the Little Cuyahoga River for the Rack 27 portion of the project. No evidence of freshwater mussel resources was noted in the project area and the proposed stream restoration should result in healthier aquatic habitats.

The Ohio Department of Natural Resource's Natural Heritage Database lists a number of state potentially threatened and threatened species within one mile of the project in protected public park land. However, these species are highly unlikely to be present in the disturbed areas of construction along Cuyahoga Street or on the mown lawn at the Memorial Parkway towpath trail parking lot.

Agriculture will be unaffected by the project, which is located in an urban area lacking farm land. Construction will be primarily in the right-of-way and no significant land use change should result from the sewer separation construction. Previous construction in the project area has encountered closed landfill materials. In anticipation of this, Akron has coordinated with Ohio EPA for appropriate permitting.

This project adds no permanent sources of air pollution. Fugitive dust from exposed soil during construction will be minimized by wetting with water or other benign dust suppressant. Exhaust from motorized construction equipment will be temporary. For these reasons, air quality will be unaffected by this project.

Sounds typical of construction (vehicles, tools) will be audible in the immediate project vicinity, which is located in an urban area. Temporary road closures will impact residents and local traffic. Residents will be notified by the contractor prior to closings, and emergency access will be maintained. In the construction area, standard public safety methods will protect pedestrians and drivers. For these reasons, the project will not adversely affect noise, traffic, public safety, or aesthetics. Rather, aesthetics will be improved by the removal of the existing sewer crossing in the stream and corresponding stream restoration.

There are no electrical components to the proposed project and therefore no additional demand on the region's energy supply.

During the planning for the proposed project, Akron coordinated with the Ohio Historic Preservation Office to determine that this project will not cause a significant adverse effect to properties listed or eligible for listing in the National Register of Historic Places (archaeological or historical resources). A 1995 Phase 1 survey found that while the project area did probably at one time contain numerous prehistoric and historic archaeological sites, urbanization has probably erased all traces of these sites. In the limited areas where new sewer lines will be placed, previous archaeological survey and historic mapping indicated that the area has little potential to contain significant archaeological artifacts.

In the event of archaeological finds during construction, Ohio Revised Code Section 149.53 requires contractors and subcontractors to notify the Ohio Historic Preservation Office of any archaeological discoveries in the project area, and to cooperate with the Office in archaeological and historic surveys and salvage efforts when appropriate. Work will not resume until a survey of the find and a determination of its value and effect has been made and Ohio EPA authorizes work to continue.

Akron has instituted a multi-year rate increase to pay for the numerous, sequential projects required by the federal Consent Decree. The typical residential annual sewer bill based on Akron's recent submittal to Ohio EPA is \$618, which is approximately 1.8% of median household income (MHI; \$34,512). A sewer bill less than 1.8% of MHI is typically considered affordable. The Ohio average residential sewer bill of \$655 is 1.2% of state MHI (\$53,301). This project requires no additional rate increase. By using the WPCLF low-interest financing for this project, Akron has minimized the cost and the economic impact on residents and the local economy of these federally-required public health and water quality improvement projects.

D. Public Participation

Akron has presented many of their ongoing and upcoming projects at a number of community meetings. Additionally, Akron will issue a news release about all Akron construction projects before the projects begin. Affected residents will be contacted by mail to alert them of the impending work near them. Akron also maintains a very informative website to let residents follow projects, "Akron Waterways Renewed."

Ohio EPA will make a copy of this document available to the public on its web page <http://epa.ohio.gov/defa/ofa.aspx> under the "What's New" tab in the "WPCLF Documents Available for Review and Comment" list.

E. Reasons for a Preliminary Finding of No Significant Impact

Based on its review of the general plans and other information collected about this project, Ohio EPA concludes that no significant short-term or long-term adverse direct environmental impacts will result from the project as related to the environmental

features discussed in this Environmental Assessment. This is because either these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts of construction will be temporary and mitigated.

This project equally serves the entire Akron community, so no particular segment of the community will be faced with additional adverse impacts or be deprived of environmental benefits, compared to any other segment.

For these reasons, this project, alone or in combination with other projects, is not expected to result in any significant indirect or cumulative short-term or long-term adverse environmental impacts. Because the project is not designed to provide additional capacity in the wastewater system for growth, the project is not expected to lead to new development.

For more information, please contact:

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