



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

April 5, 2017

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

City of Geneva, Ashtabula County, State Route 534 Sanitary Sewer
Water Pollution Control Loan Fund (WPCLF) Loan #CS390383-0015

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 proposed 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. Please note that this LER document is available for public review and comment for 15 days from the date posted above.

The WPCLF 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 review and approval process. Environmental information was developed as part of the facilities planning process. A subsequent review by this Agency has found that the proposed action does not require the preparation of 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 sewer community which is for minor upgrading and/or minor expansion of existing treatment works. More specifically, the proposed sanitary sewer connection between two previously sewer areas involves infiltration and inflow correction and construction of new additional facilities adjacent or appurtenant to existing facilities. All of the proposed improvements will be made within the sewer community of Geneva and adjacent parts of Harpersfield Township covered by a recently formed Joint Economic Development District (JEDD). As well, because the project does not directly or indirectly involve the extension of new collection sewers, an LER is also justified.

Furthermore, the proposed project:

- will have no significant adverse environmental effects;
- does not require extensive specific impact mitigation;
- will have no effect on high value environmental resources;
- is cost-effective;

- is not a controversial action;
- does not create new, or relocate existing discharges to surface or ground waters;
- 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 current design population.

Maps depicting the location of the proposed project are included as part of the LER. The LER presents information on the proposed project, its cost, and the basis for our decision. Further information can be obtained by calling or writing the contact person listed on the back of the LER during the 15-day public comment period.

The 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, pending completion of the 15-day public comment period on our proposed action, Ohio EPA expects to issue a Finding of No Significant Impact for the proposed project unless significant information to the contrary is submitted to this agency.

Upon issuance of a final determination after the 15-day public comment period, award of funds may proceed without being subject to further environmental review or public comment, unless information is provided which determines that environmental conditions for the proposed projects have changed significantly.

Sincerely,



Jerry Rouch, Assistant Chief
Division of Environmental &
Financial Assistance

JR/KH
Attachment

LIMITED ENVIRONMENTAL REVIEW (LER)

Date: April 5, 2017

A. Project Identification

Name: City of Geneva State Route 534 Sanitary Sewer Project

Address: Mr. Douglas Starkey, City Manager
Mr. Gary Hydinger, Wastewater Superintendent
City of Geneva
44 North Forest Street
Geneva, OH 44041

Water Pollution Control Loan Fund (WPCLF) #: CS390383-0015

B. Existing Need

The City of Geneva identified the State Route 534 sanitary sewer project in 2012 as a relief sewer project needed to reduce the number of backup events to the environment by 50% or more during wet weather. According to city, these events between the late 1990s and 2011 were a result of inadequate capacity of sanitary sewers or satellite equalization basins. More specifically, the city indicated that eight occurrences of basement backups or other overflow events were expected to be eliminated by completion of this proposed project within the Old Orchard sanitary sewer service area of Harpersfield Township. Streets primarily affected by these backups included Old Orchard Drive (18 homes), Roxbury Drive (3 homes), and Hummingbird Court (1 home) inside Geneva's sanitary sewer service area (see Figures 1-6 below).

In addition to eliminating sanitary sewer overflow events, the proposed project will provide sanitary sewer capacity to serve expected development in the area between Green Ridge Drive (in Geneva) and Old Orchard Drive (in Harpersfield Township) as shown below in Figure 1. Thus, in some respects this project builds on the city's efforts in the mid-1990s to intercept the wastewater flows from the Old Orchard subdivision south of Geneva and eliminate the private wastewater treatment plant (WWTP) formerly serving this area. This earlier project was also funded by Ohio EPA's WPCLF program. Upon project completion, the city expects that it will be able to provide sanitary sewer service to existing commercial properties along State Route 534 that include several restaurants, a gas station, and a motel.

Ashtabula County, Harpersfield Township, Geneva, and a recent Geneva/Harpersfield Joint Economic Development District (JEDD) have reviewed this project and found it to be consistent with regional planning for the project area. Cowles Creek and its tributaries currently appear to be adversely affected by the wastewater problems noted above and the resulting water quality conditions found in the project area. Ultimately, the net effect of the relief sewer's construction will be to reverse the flow direction in Geneva's Old Orchard Drive sanitary sewer and to convey existing and future wastewater flows north to the city's WWTP (see Figure 2). More details on this proposed project can be found in the "Project Description" section of this document.

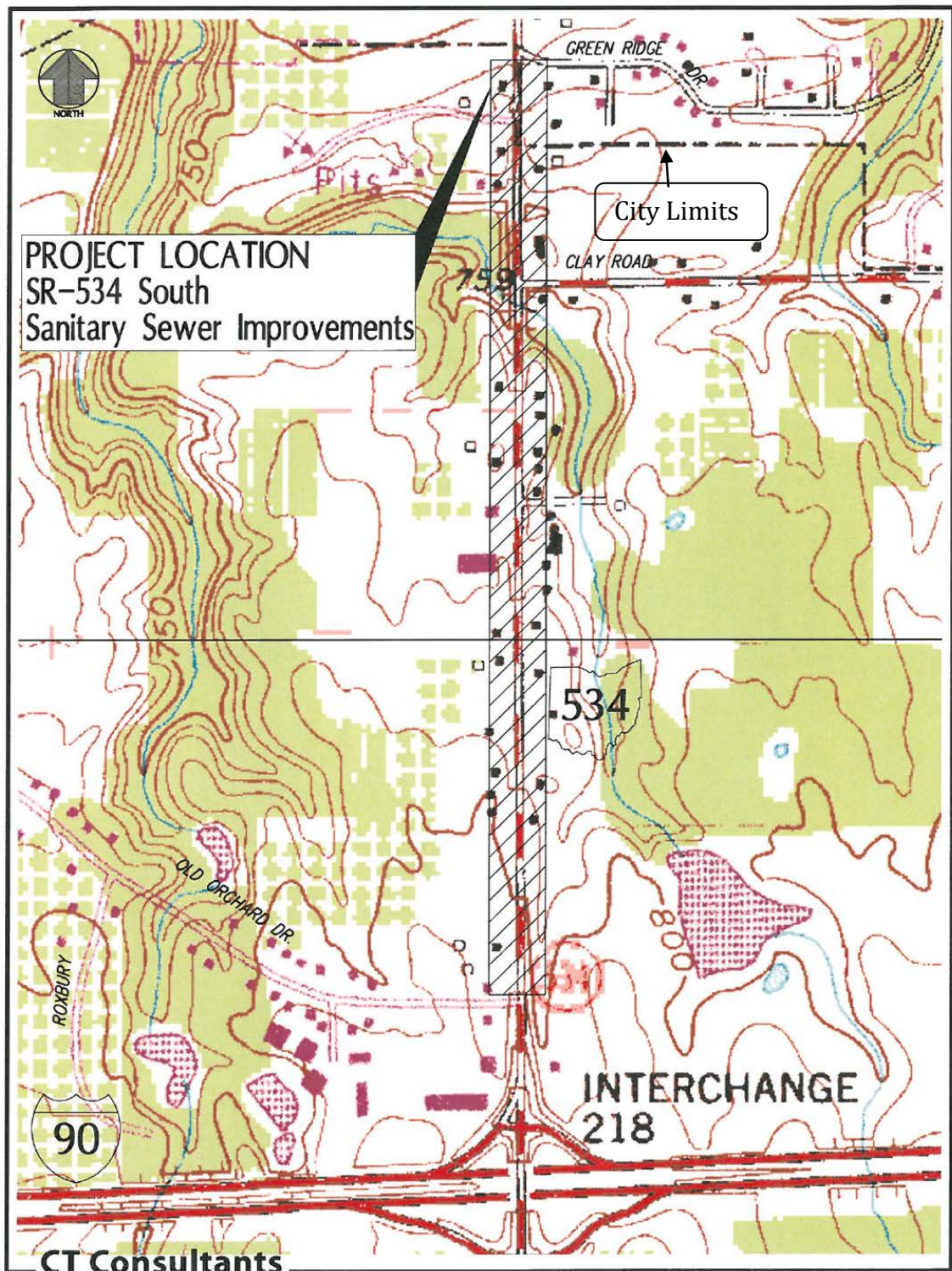


Figure 1, Topographic Map of Project Area

C. Project Description

After cleaning the Old Orchard Drive sanitary sewer three times since October 2008 and finding that a no-action alternative would leave unresolved the identified problems within the project area shown in Figure 1, the City of Geneva determined that the State Route 534 sanitary sewer project, as described below, is needed to provide a long-term, regional solution to the area's wastewater needs, and to convey the wastewater flows to the city's WWTP shown below in Figure 2. Of the two sanitary sewer options considered during project planning, the gravity sanitary sewer option was shown to be more cost-effective than an alternative consisting of a pump station, force main, and gravity sewer on the basis of slightly lower capital costs, lower operation, maintenance, and replacement (OM&R) costs, and greater expected reliability. Each of these two options would require extending an existing culvert underneath State Route 534 at a cost of about \$45,000, and the permanent filling of 55 lineal feet (lf) of stream.

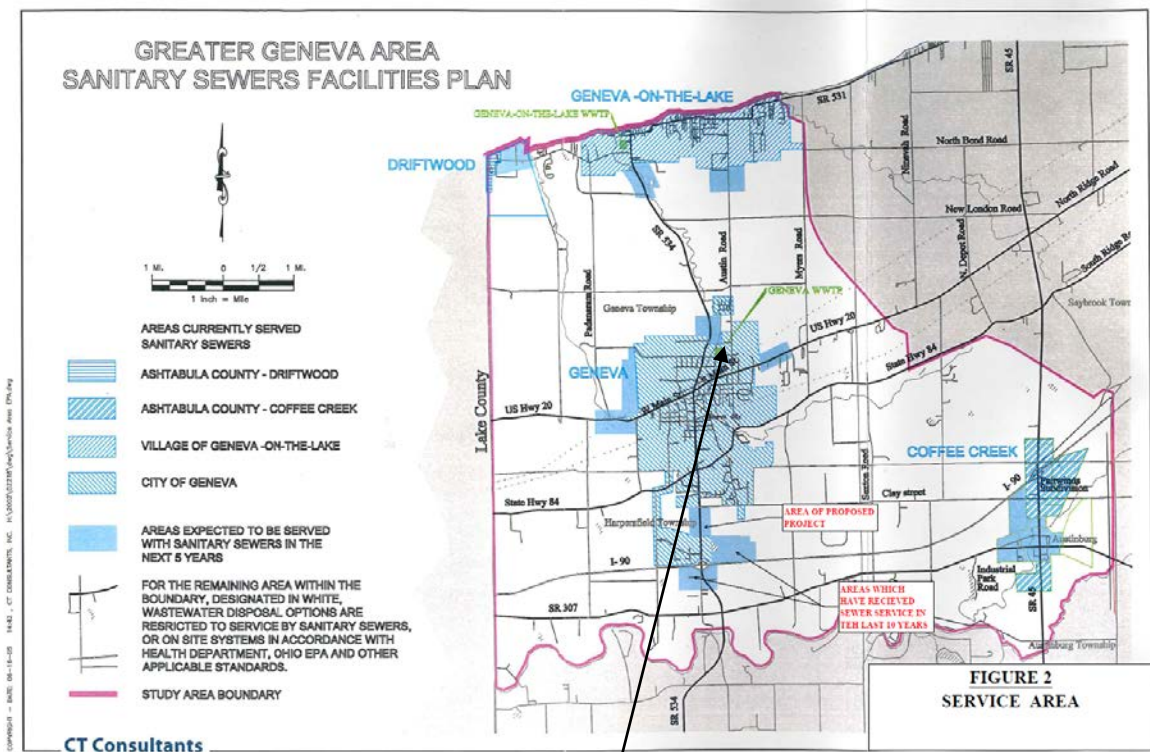


Figure 2, City of Geneva's WWTP Location

During project planning, the city's consulting engineer estimated that the proposed sanitary relief sewer project would entail constructing 4,700 lf of new 12" diameter sanitary sewers and appurtenances along the State Route 534 corridor. As shown below in Figure 3, the new sanitary sewer will connect into an existing sanitary sewer manhole at Green Ridge Drive on the north end of the project and on the south end of the project at a manhole located on Old Orchard Drive. These figures were revised upward during project design to include 5,177 lf of eight-inch and twelve-inch diameter sanitary sewers, with an alternative bid item of 1,154 lf of micro-tunnel installation to avoid extensive earth disturbing activities. The start-up and design year flows for the proposed project are identical at 0.2 million gallons per day (mgd). On this basis,

the area shown in Figures 2 and 3 is expected to benefit from improved water quality with elimination of these privately owned wastewater treatment systems and conveyance of wastewater flows north to the City of Geneva's WWTP. Upon completion of this sanitary relief sewer project, the city plans to have its contractor restore all disturbed public and private property to a pre-construction (or better) condition. Both before beginning construction and after the project is finished, the contractor will televise the sanitary sewer alignment to document site conditions.

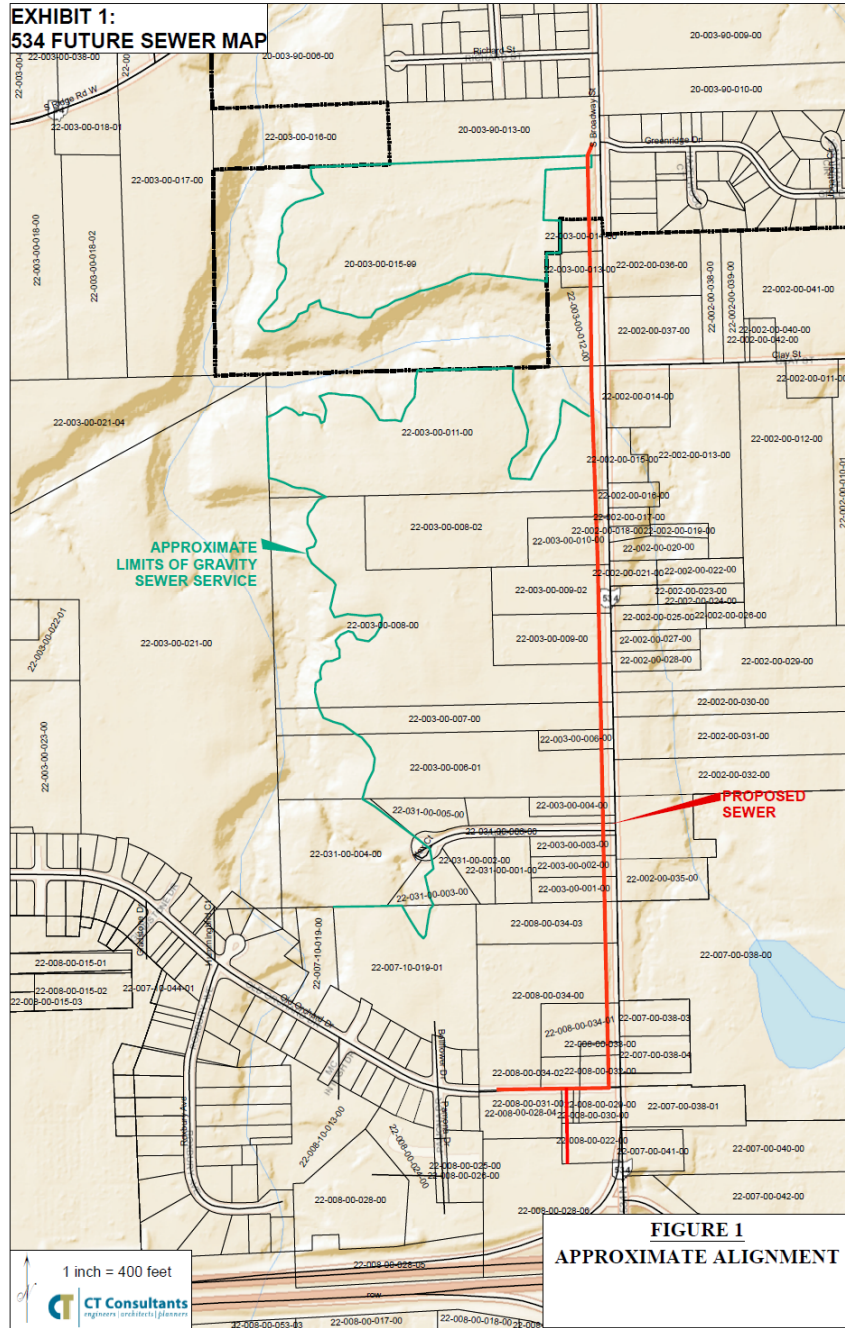


Figure 3, Project Alignment and Relation to Existing Streets

The city's consultant originally estimated in 2016 that construction of the proposed State Route 534 sanitary sewer project and related improvements would cost about \$1.9 million and take one year to complete. Total, as-bid, construction costs are now about \$1.78 million, with an extra \$504,283 in design, contingency, and other costs. Funding will be provided by multiple sources, including the Appalachian Regional Commission (ARC), the Ohio Public Works Commission (OPWC), local funds, the Local Governments Improvements Fund (LGIF), and the WPCLF. The city did not incur any planning costs during this project.

D. Limited Environmental Review (LER) Criteria

Because the proposed project meets certain minimum conditions and will not individually, cumulatively over the useful life of these improvements, or in conjunction with other federal, state, or private actions have a significant adverse effect on the quality of the human environment, an LER is warranted. More specifically, these conditions cover actions in sewer communities (such as Geneva and parts of Harpersfield Township) which are for infiltration and inflow correction, functional replacement of existing mechanical equipment or structures, and construction of new ancillary facilities adjacent or appurtenant to existing facilities. In addition, the proposed project also meets the following specific criteria for an LER:

1. **The proposed project will have no significant adverse environmental effects.** The city's proposed project is located within previously disturbed landscapes inside the City of Geneva and adjacent Harpersfield Township. During the environmental reviews of this project, Ohio EPA and the city's engineering consultant identified all the potentially sensitive environmental areas in their vicinity and found that only one (a short stream crossing) is present in the immediate project area. By specifically prohibiting the placement of any excavated material in the wetlands near Geneva and within Cowles' Creek floodplain, by requiring the city's contractors to adhere to the routine prohibited construction activities in the detail plans, and by installing the sanitary relief sewer between the top of the extended culvert and the finished grade, no in-stream work will be needed to complete the actual sewer installation part of the project. On this basis and removal of about 15 trees and some brush prior to initiation of construction, the city's proposed project is expected to have no significant adverse environmental effects.
2. **The proposed project does not require extensive general or specific impact mitigation.** Due to the limited scope of the city's proposed project and its location within a previously disturbed landscape, no extensive general or specific impact mitigation is required. In fact, the State Route 534 Sanitary Relief Sewer Project will only involve work under streets and within the acquired publicly-owned rights-of-way on the west side of the highway to assure the integrity of the city's sanitary sewers. Environmental impacts will be held within acceptable levels through proper erosion and sedimentation controls and temporary and permanent seeding of areas disturbed during construction, as well as adherence to prohibited construction activities in the detail plans and the conditions in the Army Corps of Engineers' nationwide permit. Local residents should expect minor traffic disruption during the construction of this WPCLF funded project within Geneva and the adjacent township area.
3. **The proposed project will have no adverse effect on high value environmental resources.** As noted above, the project area is generally devoid of any high value

environmental resources and steps have been taken to assure that no adverse off-site impacts to floodplains, wetland, or the species that depend on them occur during construction. However, there is one area of in-stream work. It entails extending an existing 173-foot-long culvert by 35 feet and installing 20 lf of rock channel protection for a total of 1,045 square feet of permanent fill. The detail plans provide information on how the site will be stabilized and restored after construction is complete. All spoil material from excavated sewer trenches will be disposed of at this one site along the alignment north of Clay Road. The photo in Figure 4 below supports this conclusion.

4. **The selected alternative for this project is clearly cost-effective.** In comparison to a no-action alternative and a combined pump station, force main, a gravity sewer option the city's selected alternative of solely a conventional gravity relief sewer is clearly more cost-effective. The reason for this conclusion is that the gravity sewer option has lower capital and OM&R costs than a combined pump station, force main, and gravity sewer alternative. Ohio EPA has reviewed this project and found it to be consistent with the water quality management plan for Geneva. Please see Figure 4 below for a layout of the proposed project. Figure 5 below provides the latest available map of the city's sanitary sewer system.

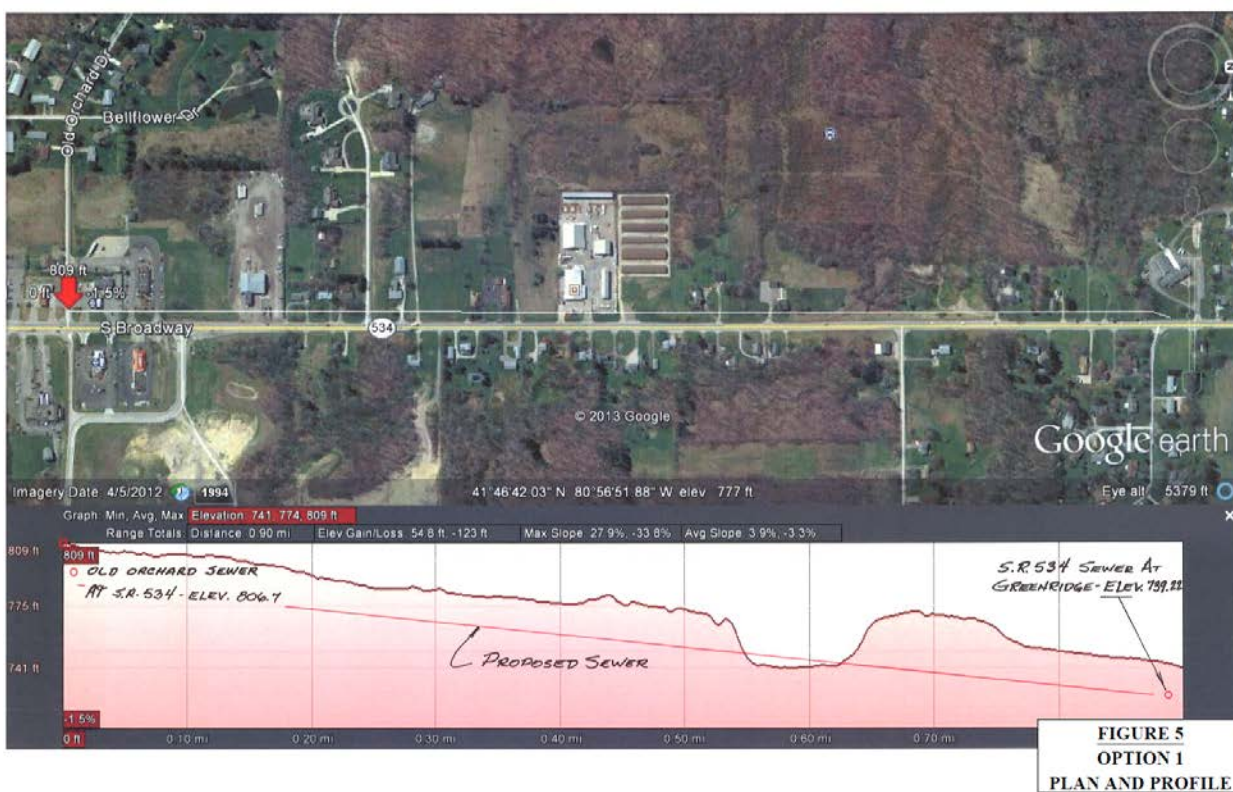


Figure 4, Location of the State Route 534 Project

5. **The proposed project is not a significantly controversial action.** Because the city's State Route 534 Project required easement acquisition and was related to a proposal for a third JEDD between the city and Harpersfield Township, Geneva held a public meeting on the proposed project and formation of the third JEDD on June 9, 2014. The township

had a similar meeting on June 2, 2014. The city's wastewater superintendent sent a letter to project area residents and other property owners on May 9, 2014 informing them of these opportunities to learn more about the proposed project and JEDD 3 formation. Combined with other meetings open to the public from early 2013, the notification letter and two public meetings provided project area residents with an opportunity to voice their concerns and have them addressed by city and township officials. According to the city, the only negative comment received regarding the proposed project or JEDD 3 formation was related to its costs. All the rest were supportive.

In terms of this project's effects on users, the city currently has a minimum charge of \$11.76 for 200 cubic feet of water usage. With an average residential customer using about 400 cubic feet per month, this usage is equivalent to a monthly fee of \$23.52 based on \$5.88 for each 100 cubic feet of water used. This and other previously enacted rate increases averaging 4% per year through 2021 appear not to have been controversial. In 2018, this rate is expected to increase to \$6.11 per 100 cubic feet with a minimum usage fee of \$12.22 for the first 200 cubic feet of water. Assuming an average usage of 400 cubic feet, this post-project rate is equivalent to about \$24.44 per month. Expressed as a percentage of Geneva's recent annual median household income of \$41,775, a post-project fee of \$293.28 is equivalent to 0.7% and is generally considered to be affordable for the average city resident. An additional factor considered by Ohio EPA in this situation is that the JEDD 3 project area has its own tax base and supports project area residents not needing to pay higher sewer fees. Readers should note that some of the expenses coming initially out of the city's wastewater proprietary fund will be reimbursed by proceeds from the funds coming into the JEDD 3's account from such sources as township income taxes, development fees, hotel/motel taxes, and tax-increment financing payments.

6. **The proposed project does not involve new or relocated discharges to surface or ground waters.** The city's proposed project will help address the long-term wastewater needs of its residents. As noted above, the project area has a long history of basement backups and other releases of untreated wastewater to the environment. By correcting this problem, water quality conditions are expected to improve when residential basement back-ups and other releases cease after the project is completed, and all wastewater flows are directed properly to the city's WWTP for processing and discharge to Cowles' Creek. Thus, no new or relocated discharges of untreated wastewater to surface or ground waters will occur as a result of the proposed project.
7. **No substantial increase in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters will occur.** As noted above, the proposed project's average daily flow of 0.2 mgd is not expected to increase during the design life of the project, and, when combined with eliminating releases of wastewater to the environment, will not substantially increase the volume of discharge or the loading of pollutants from Geneva's existing WWTP to Cowles' Creek. Rather, the project should help assure that wastewater from the project area is properly routed to the city's WWTP for treatment and subsequent discharge.
8. **The proposed project will not provide capacity to serve a population substantially greater than the existing population.** The city's proposed relief sewer project is

intended to properly convey the wastewater originating in the project area to the city's WWTP. As such, it is not intended solely to serve a population substantially larger than now exists, or an undeveloped area.

E. Estimated Project Costs

Prior to bidding this project, the total estimated design and construction costs were about \$2.04 million. Of this total project cost, construction costs were estimated at about \$1.9 million. Based on as-bid costs, the construction costs are now about \$1.78 million and total project costs are about \$2.3 million. To pay for construction of these improvements and related construction management and contingency costs, the City expects to borrow about \$1.56 million from the WPCLF at a 1% interest rate and use the three other sources of grant funds to finance the balance of these costs. Ohio EPA expects that Geneva will save about \$474,206 over the twenty-year term of its loans when compared to a market-rate loan of 3.58%.

F. Proposed Project Schedule

Following opening bids for this project in February 2017, the city expects to receive WPCLF financing in April 2017. Construction of the proposed relief sewer project is expected to begin in May 2017 and be completed within one year, including final restoration.

G. Public Participation and Notice

As noted earlier, Geneva held public meetings and provided local residents with a letter summarizing this project and the related JEDD 3 proposal in May 2014. The city and township public meetings were held in June 2014. Public comments received in response to the meetings and fact sheet generally focused on concerns related to development fees, property access and commercial signage, and detours on Old Orchard Drive. These concerns appear to have been adequately addressed by the proposed use of microtunneling, rather than open trench construction, and other adjustments to the project. On this basis, the City of Geneva appears to have adequately informed the public about its proposed project and addressed their concerns through these outreach efforts.

Information that supports this decision to issue an LER is available from the contact at the end of this document. Project information is available from either the City of Geneva's consulting engineer, Mr. Shawn Aiken of CT Consultants (his phone number is 440-530-2282) or the city's wastewater superintendent, Gary Hyding. He can be reached at 440-466-4228 or through the city's municipal offices located at 44 Forest Street, Geneva, OH 44041 to answer questions regarding this project and JEDD 3.

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 an LER:

Ohio Department of Natural Resources
Ohio EPA
United States Army Corps of Engineers

State Historic Preservation Office
United States Fish and Wildlife Service

I. Conclusion

The proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. The planning activities for the proposed projects have identified no potentially significant adverse impacts. The proposed projects are expected to have no significant, short- or long-term adverse impacts on the quality of the human environment or on sensitive resources such as floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, coastal areas, or threatened or endangered species. The main benefit of this project will be the reestablishment of a reliable sanitary sewer system in the Old Orchard portion of the City of Geneva and adjacent township areas, and elimination of sewage backups into the environment and basements.

J. For further information, please contact:

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

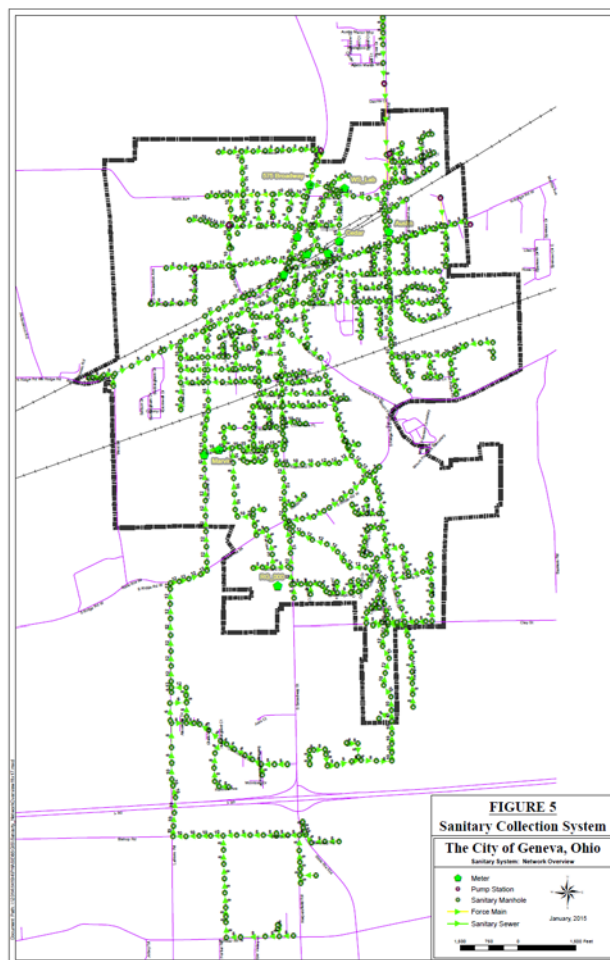
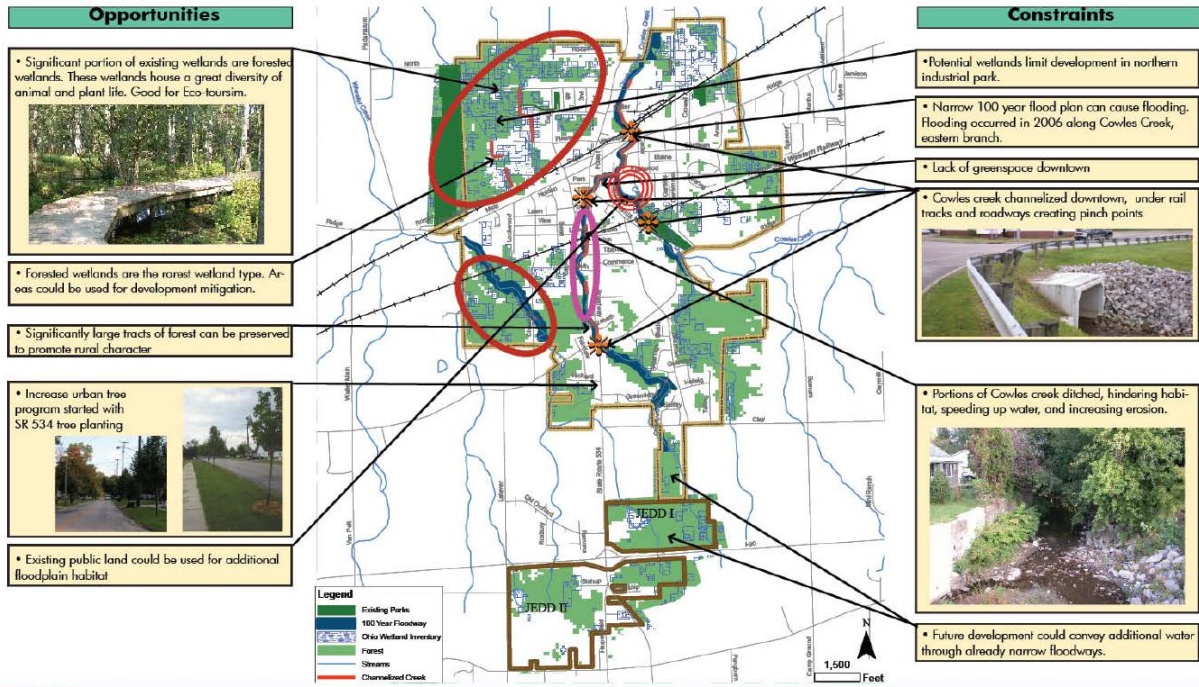


Figure 5, City of Geneva Sanitary Sewer System Map



Opportunities & Constraints - Environmental Resources

Figure 6, Map from the City's State Route 534 Corridor Plan - Opportunities/Constraints Analysis