



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

September 17, 2021

Limited Environmental Review and Finding of No Significant Impact

**City of Akron – Summit County
Water Main Replacement Program 2021
Loan number: FS390095-0241**

The attached Limited Environmental Review (LER) is for a water main replacement project in Akron which the Ohio Environmental Protection Agency intends to finance through its Water Supply Revolving Loan Account (WSRLA) below-market interest rate revolving loan program. The LER describes the project, its costs, and expected environmental benefits. Making available this LER 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 WSRLA program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. This project's relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment. More information can be obtained by calling or writing the person named at the end of the attached LER.

Upon issuance of this 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,

Jonathan Bernstein

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Water Main Replacement Program 2021

Applicant: City of Akron
166 S. High St., Room 200
Akron, OH 44308

Loan Number: FS390095-0241



Figure 1. Summit County

Project Summary

The City of Akron, in Summit County (Figure 1), has applied for funding from the Ohio Water Supply Revolving Loan Account (WSRLA) to fund the Water Main Replacement Program 2021 project. This project is intended to replace deteriorated drinking water mains and associated components in Akron's public water system (PWS).

History & Existing Conditions

Akron's PWS has over 1,300 miles of water mains currently in distribution serving approximately 300,000 customers in Akron and surrounding areas. The average water demand on the system is 32 million gallons per day (mgd). Due to old age and material, water mains in parts of the distribution system have significantly deteriorated and are prone to chronic breaking. This led to customer complaints about discoloration and sediment in the drinking water. Additionally, water main leaks and breaks contribute to the overall unaccounted-for water loss within the distribution system, which is estimated to be 15%, and can also affect water pressure. Akron plans to replace 100 miles of compromised water mains over the next 20 years.

Project Description

Akron will replace roughly 13,000 linear feet of deteriorated 6, 8, 12, and 16-inch water main, along with valves, hydrants, fittings, and service lines, in areas of their distribution system. The new water mains will be cement-lined ductile iron pipe. Existing service lines will be replaced with copper lines and connected to the new water mains. Also included in this project is asphalt, concrete, curb, and earth restoration to pre-construction conditions. Construction activities requiring work on private property will be at no cost to residents. Permission will be obtained for the contractor to conduct work on private property through Akron's standard work agreement.

The replacement of failing mains will increase system reliability, improve fire flows, improve water quality, and eliminate existing lead joint material and potentially harmful water service lines by replacing them with copper lines in the project area.

The water mains to be replaced are in various locations (Figure 2) across the distribution system, as follows:

- Trentwood Drive (Auburndale Avenue to Reynolds Avenue)
- Courtleigh Drive (Walton Drive to Reynolds Avenue)
- Edgemoor Avenue (S. Hawkins Avenue to West End)
- Seward Avenue (Bellevue Avenue to Stoner Street)
- Laffer Avenue (Mack Street to Iroquois Avenue, Para Avenue to Pioneer Street)
- N. Firestone Boulevard (Inman Street and Sylvan Avenue)
- E. Waterloo Road (Allendale Avenue to 500 feet West of Arlington Street)
- E. Woodsdale Avenue (Clairmont Avenue to Thornapple Avenue)
- Rea Avenue (Benton Street to E. Market Street)

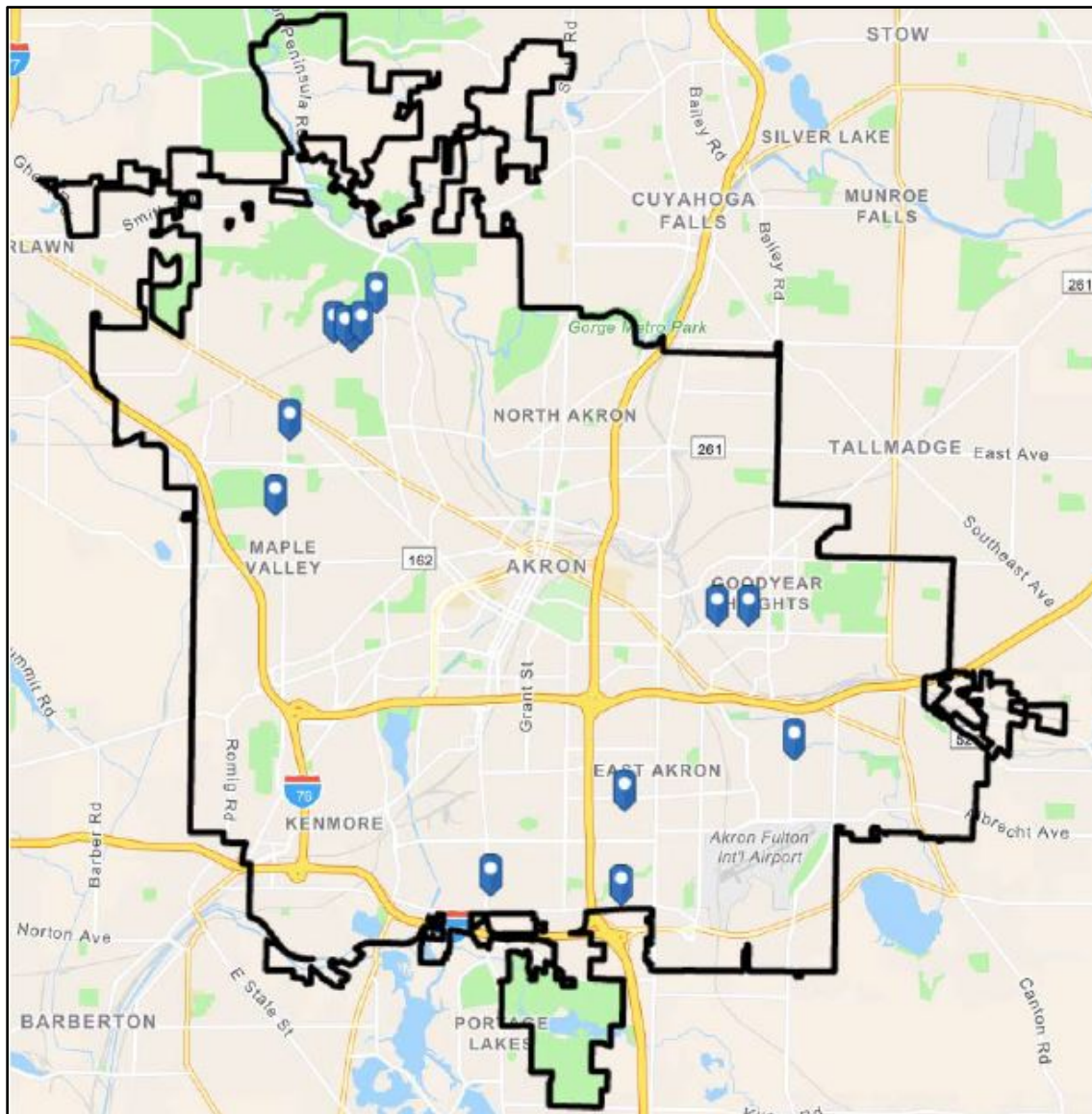


Figure 2. Proposed water main replacement locations (see blue pins)

Implementation

Akron proposes to borrow the estimated amount of \$2,312,000 from Ohio's WSRLA to fund this project. Akron qualifies for the standard below-market interest rate of 0.57% (WSRLA loan interest rates are set monthly and may change for the requested loan award date).

Assuming a 25-year loan, borrowing the estimated amount using WSRLA dollars could save Akron approximately \$420,000 over the life of the loan compared to the current market rate of 1.87%. The debt associated with this construction project will be recovered from monthly user charges. The typical annual water bill for residents served by Akron is \$258. This is 0.7% of the median household income (MHI: \$37,533) and compares favorably to the Ohio average annual water bill, \$639.

The water service charges for Akron customers are driven by the total indebtedness of Akron (and annual O&M costs), as opposed to the specific indebtedness of any particular project. Akron will not enact a special increase in user rates specifically to pay for this project; instead, rates were increased in 2012 to cover debt, which includes debt for this and other projects.

Construction is expected to begin following loan award and take approximately one year to complete.

Public Participation

Information regarding this project has been made available on Akron's website, including a press release from the mayor regarding the water main replacement program. Residents have been able to reach out to city officials regarding their concerns and questions.

Ohio EPA is unaware of controversy or opposition to this project. Ohio EPA will make a copy of this document available to the public on its web page (<https://www.epa.state.oh.us/defa/ofa> under the "What's New" tab in the "WSRLA Documents Available for Review and Comment" list) and will provide it upon request.

Conclusion

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

Will have no significant environmental effect, will have no effect on high value environmental resources, and will require no specific impact mitigation. There are no sensitive resources in the project area such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, or threatened or endangered species. Akron will remove trees, if determined necessary, during the regular clearing season to avoid potential impacts to endangered and threatened bat species. Temporary traffic disruptions will be minimized by standard construction traffic control maintenance measures. Noise and dust caused by construction activities will be short-term and minimized using standard construction best management practices. The contractor is required to notify owners of affected properties abutting the project area a minimum of 72 hours prior to commencing construction. Residents typically receive notice a week in advance of interruptions to water service.

Is cost effective and not a controversial action. This project will have no impact on residential water rates, and there is no known opposition to this project. Replacement of private-side lead service lines found during construction will be at no cost to residents. Replacing water mains that are prone to leaks and breaks, which contribute to water loss, will reduce lost revenue for Akron. Other alternatives such as lining of existing water mains with cement, epoxy, or polyester membrane were determined to be more expensive and less practical than by the traditional open-cut replacement method.

Does not create a new or relocate an existing discharge to surface or ground waters, does 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, does not substantially increase the volume of discharge or 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. This project merely improves existing infrastructure with like-for-like replacement of water mains and associated components; thus, there will be no effect on water withdrawal, treatment, discharge, water source, or service capacity.

The planning activities for this project have identified no potentially significant adverse impacts. The project is expected to have no significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources (surface waters, coastal zones, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, threatened or endangered species, or state and federal wildlife areas). Implementation of the appropriate construction mitigation measures are required by the contract specifications, and construction activity will be limited to roads, rights-of-way, and lawns. The project will benefit the residents of Akron and the surrounding area by replacing deteriorated water mains that have the potential to negatively affect water quality.

Contact information

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