August 1, 2019

Limited Environmental Review and Finding of No Significant Impact

City of Akron – Summit County
Mayfield Avenue Sewer Improvements
Loan number: CS390095-0111

The attached Limited Environmental Review (LER) is for a wastewater collection project in Akron 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 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, as described in Ohio Administrative Code (OAC) 3745-150-05.

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. This project’s relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment, as described in OAC 3745-150-06. 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,

[Signature]

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment
LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: City of Akron Mayfield Avenue Sewer Improvements

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

Loan Number: CS390095-0111

Project Summary

The City of Akron, Summit County, applied for funding from Ohio EPA’s Water Pollution Control Loan Fund (WPCLF) to finance the rehabilitation of existing sanitary sewers and manholes and installation of two new manholes and a sanitary sewer in the area near Mayfield Avenue. The total estimated loan amount for the project is $865,097.

History & Existing Conditions

The City of Akron owns and operates a sewer collection system and water reclamation facility (WRF). Akron’s combined sewer system currently drains over 96 square miles and serves approximately 330,000 people, including the neighboring communities of Cuyahoga Falls, Stow, Springfield, Mogadore, Lakemore, Tallmadge, Fairlawn, Bath, Montrose and other unincorporated areas.

In many parts of the collection system, Akron has combined sewers (pipes that only carry sewage in dry weather but carry sewage mixed with storm water during wet weather). When flows rise dramatically during and after rainfall, combined sewer overflow (CSO) structures divert untreated sanitary sewage mixed with storm water to area streams (the Cuyahoga River, the Little Cuyahoga River and the Ohio Canal). 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 U.S. Environmental Protection Agency (USEPA) Consent Decree.

Akron conducted an Infiltration and Inflow (I/I) study of the Mayfield Avenue project area in 2014. The study was initiated to determine the cause of reported basement back-up events in the surrounding area. The study revealed that several areas of the combined sewer system are experiencing inflow (excess water from improper connections to the sewer system) and infiltration (excess water from leaking pipes and connections). The existing vitrified clay pipe (VCP) sewers and brick manholes are not up to current standards which are intended to minimize infiltration. The study also determined that the collection system’s hydraulic capacity in this area is sufficient to handle expected sanitary flows but not adequate for additional storm water flows during wet weather.
**Project Description**

This project will (see Figure 1 for project locations):

- Rehabilitate existing sanitary sewers, storm sewers and manholes along Maplewood Avenue, Mayfield Avenue, Twin Oaks Road, W. Market Street and N. Rose Boulevard by cleaning and relining
- Install 353 linear feet of 8-inch diameter sanitary sewer along Maplewood Avenue
- Install a precast concrete manhole on N. Rose Boulevard

Figure 1 – Project location (green line) in Akron, Ohio

**Implementation**

Akron will borrow $865,097 to finance the Mayfield Avenue Sewer Improvements project from the WPCLF program at the standard interest rate of 1.62%. During the 30-year loan period, Akron will save approximately $180,371 by borrowing WPCLF dollars at this rate, compared to the market rate of 2.92%.
Construction for the Mayfield Avenue project is expected to begin in September 2019 and be completed by May 2020.

Public Participation

This project was included in the City of Akron 2016 Capital Investment and Community Development Program which was passed by the City Council on February 8, 2016. A press release was issued in January 2016 that included all of Akron’s 2016 WPCLF projects. Akron has also knocked on doors of residents in the affected area to inform them about the project.

Ohio EPA will make a copy of this document available to the public on its web page (http://epa.ohio.gov/defa/ofa.aspx WPCLF Documents for Review and Comment) and will provide it on request to interested parties.

Information supporting this Limited Environmental Review (LER) is available from the project contact named below.

Conclusion

The project work will primarily occur in roads, rights-of-way and residential lawns, therefore no sensitive environmental resources, such as streams, wetlands, state or federal threatened or endangered species, or historical properties, will be impacted. There are no stream crossings. If tree clearing is necessary, it will only be completed between October 1 and March 31. Standard construction best management practices will be used to address noise, dust, traffic disruption, and storm water runoff.

Ohio EPA conducts environmental review of all projects prior to approving WPCLF financing. The proposed project meets the criteria for a Limited Environmental Review (LER). The project includes rehabilitation of existing sanitary sewers and manholes and installation of two new manholes and a sanitary sewer in the area near Mayfield Avenue and therefore meets the following criteria for an LER:

- **It has no significant environmental effect and will require not specific impact mitigation** as sensitive resources such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, or threatened or endangered species are not present in the project area. If necessary, tree clearing for the project will occur only between October and March.

- **It does not require extensive specific impact mitigation**, as the proposed project will occur primarily along roads, rights of way, and residential lawns.

- **It has no effect on high value environmental resources** because the project work will primarily occur in roads and rights of way with no high value environmental features.

- **It is not a controversial action**, as there is no known opposition to the project and it will not affect sewer rates.

- **Is cost-effective**, as it will make necessary improvements to Akron’s collection system to
help reduce inflow and infiltration and will also alleviate basement flooding.

- It does not create a new, or relocate an existing, discharge to surface or ground waters; and it 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 since the proposed project will reduce inflow and infiltration in the collection system.

- It will not provide capacity to serve a population substantially greater than the existing population, since the project will not extend service to new customers and will reduce inflow and infiltration in the collection system, which contribute to increased flows.

The planning activities for the 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 is required by the contract specifications. The project will benefit the residents of Akron by reducing inflow and infiltration in the collection system and eliminating basement flooding.

**Contact Information**

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