



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

October 7, 2021

**Limited Environmental Review and Finding of No Significant Impact**

**Geauga County – Bainbridge Township Water Line Extension Loop Closure Project  
Loan number: FS390028-0028**

The attached Limited Environmental Review (LER) is for a water infrastructure improvements project in Geauga County 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: Bainbridge Township Water Line Extension Loop Closure Project

Applicant: Geauga County  
470 Center Street, Building #4  
Chardon, Ohio 44024

Loan Number: FS390028-0028

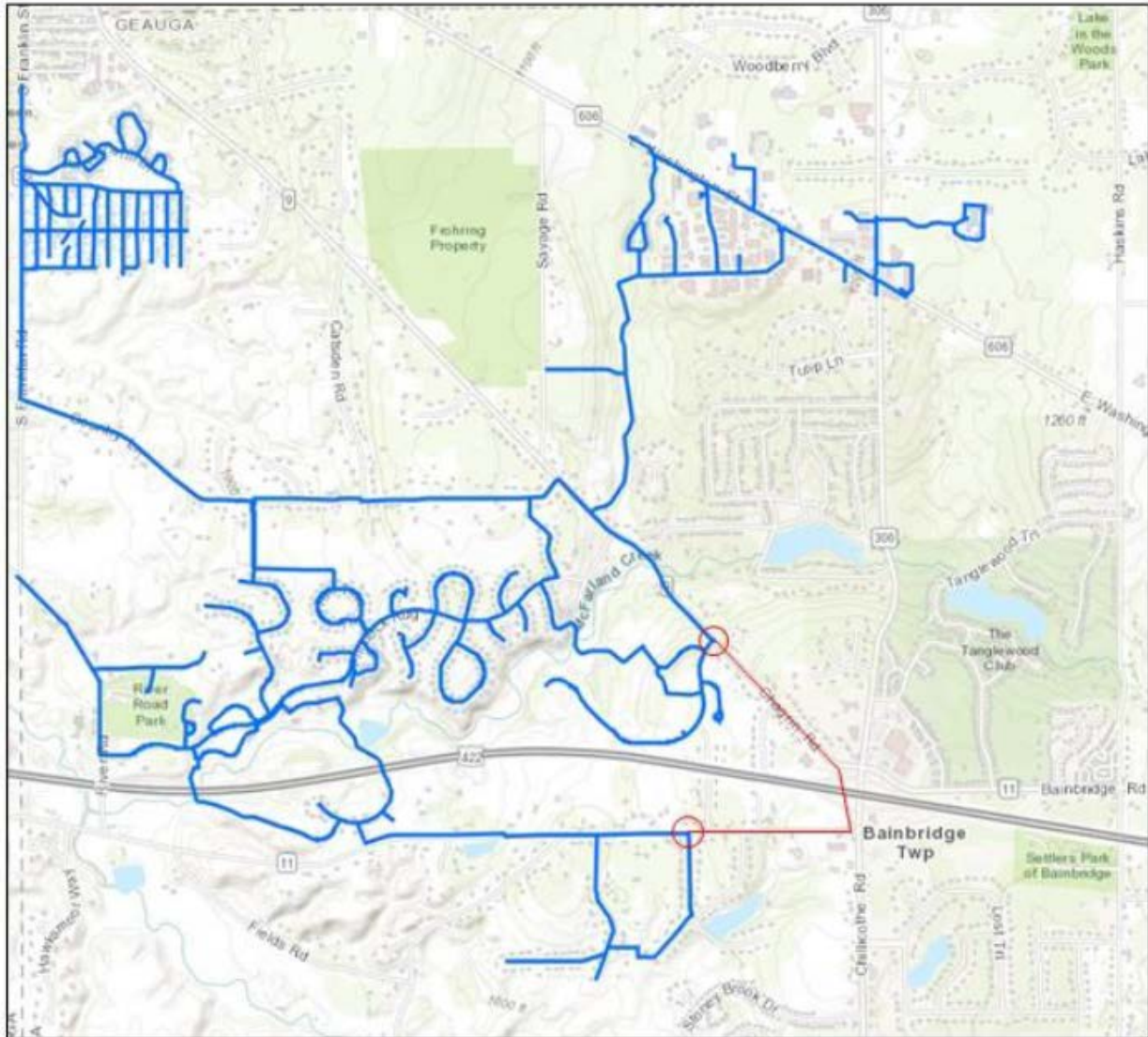
### **Project Summary**

Gauga County, through its Department of Water Resources, is requesting loan funds from the Ohio Water Supply Revolving Loan Account (WSRLA) program to finance the construction of a water line loop closure project in Bainbridge Township at an estimated construction cost of \$1,520,250. According to the county, this proposed project is the last step in a series of nine water line extensions into Bainbridge Township from the City of Cleveland's water department. This project will connect two waterlines, both coming from the same water provider, and create a complete loop or circuit for dependable potable water supply. All of the proposed construction will occur within a prior disturbed water main alignment. The county expects that this proposed water line loop project will ensure continued service should there be a water main break.

The county anticipates that its existing water fee rate structure with no rate increases scheduled through 2022 will be sufficient to pay for this project's expected annual debt service.

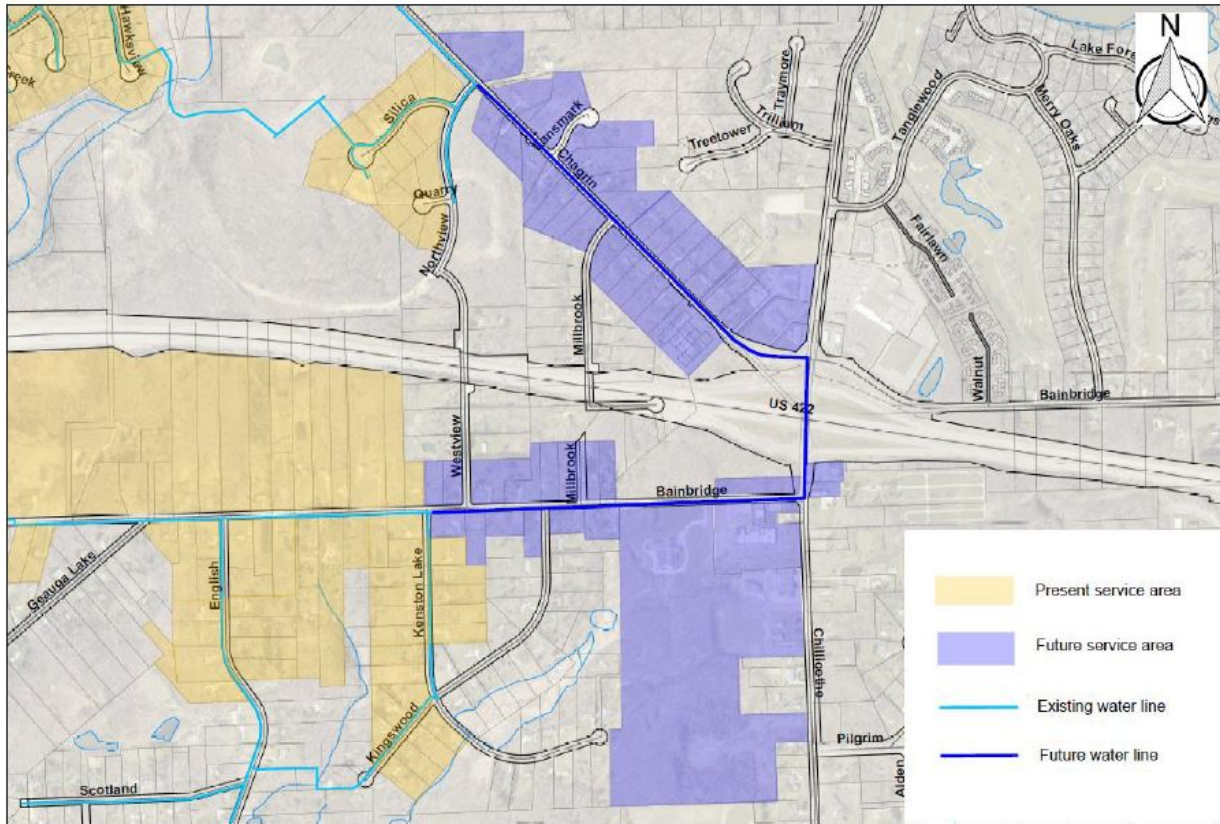
### **History, Existing Conditions, and Future Conditions**

Gauga County indicated in its plan for this proposed project that its water lines providing City of Cleveland water to its residents terminate along Bainbridge Road, Chagrin Road, and in a neighborhood on East Washington Street (north). Should a major water main break occur along either Bainbridge Road or Chagrin Road, such a break could result in loss of potable water to residents and leave hydrants dry. The county has been planning this project since January 2018 when it concluded its intermunicipal service agreement with the City of Cleveland's water department. In addition to this situation, the county has been notified by Bainbridge Township that it wants to have a more reliable water supply and to stop using its wells for potable water. Finally, the county has been contacted by numerous (as many as 53) potential residential and commercial customers along the alignment about tying into the new water line when service becomes available.



**Figure 1. Proposed water line project alignment and connection points**

According to the county, this proposed project will provide expanded water service once it is completed. The county's expectation is that the locations shown in Figure 2 below represent the most likely service area and will produce significant revenue once a dependable source of potable water is made available through this project.



**Figure 2. Map of present and future water service areas**

**Project Description**

To address the conditions described in the previous section, Geauga County’s proposed water line looping project consists of installing between 6,400 and 7,300 lf of 12-inch diameter ductile iron water pipe in prior disturbed locations as shown above in Figures 1 and 2. The streets and adjacent rights-of-way which the proposed project will affect include Bainbridge Road, Chillicothe Road (State Route 306), and Chardon Road. In general, where the proposed water line will not be installed underneath existing pavement, it will be placed between the edge of pavement and such existing utilities and features as driveway aprons, storm sewers, and roadside ditches. As shown on the detail plans, this proposed project entails one small, culverted stream crossing. No tree removal is expected to be needed for this proposed project’s construction. Also, site grading is expected to be minimal as existing site contours will be restored for proper drainage purposes upon project completion. No service lines are included as part of this project.

**Implementation**

To construct the proposed project described above, Geauga County intends to finance the improvements to its water system through Ohio EPA’s WSRLA and \$130,000 in local funds. Of the total project cost of \$1.65 million, no more than \$1.52 million in WSRLA funding is expected to be used by the county. As a result, the county has indicated that no water rate and fee increases are expected to be needed from 2021 through 2022 to repay the county’s WSRLA loan.

Assuming an average residential water customer uses the minimum amount of water every year (about 38,520 gallons) and so pays about \$480 annually in 2022, this expected post-project fee is about 0.6% of the county's current median household income of \$82,303 and is considered to be an affordable amount. This fee was calculated using the county's per one-thousand-gallon rate of \$12.46. These figures do not include the county's residential tap-in fee which is about \$9,000 per household if the 53 possible customers were to choose to tie into the county's water main.

On this basis, Ohio EPA expects that the county will save about \$236,600 when compared to a market-rate loan of 1.67% on the project's loan amount of \$1.52 million. By proposing to fund their project in this way, Ohio EPA anticipates that Geauga County should be able to generate enough revenue under its current and proposed rate structure to continue to own, operate, and maintain its water distribution system well into the future.

If the county's loan is awarded in October 2021, Ohio EPA expects that the county's contractor will commence construction soon thereafter and complete work in six months. By making these improvements, including site restoration, Geauga County expects to be able to maintain compliance with the federal Safe Drinking Water Act and ensure that its residents in the project area have continued water service should there be a water main break.

### **Public Participation**

According to the county's water department, the county provided project information to the public through several mechanisms. These included a virtual presentation and meeting with the Bainbridge Township trustees in December 2020, letters to area residents in May and June 2021 about the project's scope and costs, and letters to area businesses in June 2021 about the proposed water line project's connection costs.

On this basis, and the limited scope of the project covered by this document, Ohio EPA has determined that no additional public review and comment on the proposed project is necessary. All potentially interested parties appear to have been given adequate opportunity to review and comment on this project and its costs.

Ohio EPA will make a copy of this document available to the public on its web page (<https://epa.ohio.gov/defa/ofa#169638770-wsrla-documents-for-review-and-comment>) and will provide it upon request. A copy may also be posted at the village's offices, other buildings, and on its web site (if available).

### **Conclusion**

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within existing an existing water distribution system, which involves the construction of new ancillary facilities adjacent or appurtenant to existing facilities. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project

**Will have no significant environmental effect and will have no effect on high value environmental resources.** Given the proposed project's limited scope, placement within prior disturbed locations, the absence of any notable above-ground natural features within the immediate project area, and the county's approach to addressing potential effects, the proposed project will not result in any adverse environmental impacts. This conclusion is validated by the reviews completed by Ohio EPA. Limited site grading and traffic pattern changes are the only aspects of the proposed

project that may result in noticeable construction impacts. However, the county has included the needed mitigation in the detail plans to address these potential concerns. There are no floodways, large streams, or wetlands in the project alignment.

**Will not require extensive, specific impact mitigation unique to the assistance proposal.** The proposed work to complete this project is generally straight-forward and does not require any extensive mitigation of environmental impacts, as all the water system improvements will be made within previously disturbed areas. In that regard, only routine environmental impact mitigation in the form of storm water controls, spill control, dust control, vehicle emission and traffic controls, and adherence to prohibited construction activities should be necessary during the estimated six-month construction timeframe. The county expects that any spoil material generated during construction will be taken off-site and disposed of in accordance with all laws and regulations covering this activity to protect floodplains and wetlands.

**Is cost effective and not the subject of controversy or significant public interest.** In comparison to the no-action option, the county's selected alternative is more cost effective on the basis of costs and non-monetary factors. Moreover, the proposed improvements constituting this project are non-controversial because they will not adversely impact the environment, or the residential rates already being paid or scheduled to increase for county water.

**Does not create a new, or relocate an existing discharge to surface or ground waters, and 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, or substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters.** Given the project's limited scope, these criteria have been met. In particular, Ohio EPA reached the above conclusion because the size of the proposed water main looping line is the same size as the existing water mains it will connect to at the two locations shown in Figure 1. Also, the choice of residents and businesses to tie into the county's distribution system is voluntary. This project is also consistent with the county's agreement with the City of Cleveland's water department for serving Bainbridge Township.

With the county's project area in transition from less to more densely developed, the wastewater prescriptions for this part of Geauga County vary. Some parts are identified as having existing sanitary sewers or may be sewerred, while others may need sanitary sewers in the future. On this basis, Ohio EPA has determined that the current project and its potential to serve 53 existing homes and their residents in the near future should not substantially increase wastewater volumes and pollutant loadings within this part of Bainbridge Township.

**Will not provide capacity to serve a population substantially greater than the existing population.** Based on information provided by the county during planning that the project could serve 53 existing homes and an estimated 160 people after its completion, Bainbridge Township's service area population is not expected to grow significantly during the next twenty years in response to this project. Overall, the main purpose of this project is to construct improvements adjacent to existing infrastructure without any changes in production capacity or to promote future growth. On this basis, this criterion has been met.

Overall, this proposed project will not change the rated capacity of the county's water infrastructure systems by being designed to match the existing pipe sizing in the project area under peak demand conditions. This sizing is consistent with the county's expectation that limited additional population and other growth is expected during the next 20 years.

To conclude, the proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. The planning activities for the proposed project identified no potentially significant, direct, indirect, or cumulative adverse impacts. The proposed project is expected to have no short- or long-term adverse impacts on the quality of the human environment or on sensitive resources such as air quality, floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species. The county's proposed water looping project will enable the county to address its regulatory responsibilities under the Safe Drinking Water Act.

**Contact information**

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