



Mike DeWine, Governor
Jon Husted, Lt. Governor
Anne M. Vogel, Director

February 1, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Akron – Summit County
Riverside Sewer Separation (CSO Rack 34)
Loan number: CS390095-0257**

The attached Limited Environmental Review (LER) is for a combined sewer separation 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.

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. 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,

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Riverside Sewer Separation (CSO Rack 34)

Applicant: City of Akron
166 South High Street
Suite 200
Akron, Ohio 44308

Loan Number: CS390095-0257



Figure 1. Summit County

Project Summary

The City of Akron, in Summit County (Figure 1), has requested \$7.5 million from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the Riverside Sewer Separation (CSO Rack 34) project. Completion of this project is intended to reduce the amount of combined wastewater and stormwater that reaches area waterways during wet weather events and supports Akron's overall combined sewer overflow (CSO) reduction program.

History & Existing Conditions

Akron owns and operates a sanitary sewer system and water reclamation facility (WRF). Akron's sanitary sewer system 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.

Akron has combined sewers in much of their system which only convey sanitary waste during dry weather but carry sanitary waste combined with stormwater during wet weather. When flows rise dramatically during and after rainfall, CSO structures divert untreated sanitary sewage mixed with stormwater directly to area streams (the Cuyahoga River, the Little Cuyahoga River, and the Ohio Canal). Such discharges are threats to human health and the environment. An infiltration and inflow (I/I) study of the collection system revealed significant infiltration (excess water from leaking pipes and connections) and inflow (excess water from improper connections to the sewer system). Excessive I/I increase CSO events and the volume of water reaching the WRF to be treated. Due to historical and ongoing CSO events, Akron is currently implementing requirements set forth by a U.S. Environmental Protection Agency consent decree.

As part of the consent decree, Akron is required to replace the Northside Interceptor (NSI) with a tunnel of adequate storage capacity to achieve zero CSO events for typical year rainfall conditions for CSO racks 32, 33, 34, and 35. The NSI is split into three sections known as the Lower, Middle, and Upper NSI. Racks 32, 33, 34, and 35 contribute to the Middle and Upper NSI, and Racks 29 and 30 contribute to the Lower NSI. Akron intends to construct a new tunnel, referred to as the Northside Interceptor Tunnel (NSIT), to replace the Middle and Upper NSI, and will structurally reinforce the Lower NSI using cured-in-place pipe (CIPP) lining.

This project deals specifically with CSO Rack 34, located within the North Hill neighborhood, and is associated with the NSIT project and Akron's overall CSO reduction program. Rack 34 is a CSO regulator structure that receives combined sewer flow from the Rack 34 sewer area. This sewer area is comprised of a combined sewer system covering over 80 acres. During dry weather, the regulator structure diverts wastewater to the NSI, and during wet weather when combined wastewater and stormwater flows exceed the NSI capacity, diverts excess flow to the Cuyahoga River. Through completion of this project, Akron seeks to eliminate CSO events from CSO Rack 34 by conducting combined sewer separation in the Rack 34 sewer area.

Project Description

This project involves the separation of the Rack 34 sewer area combined sewer system (Figure 2) by constructing a new storm sewer system and repurposing the existing combined sewer system to convey separate sanitary flow. Construction will include an estimated 10,100 linear feet of 12-inch through 42-inch storm sewer, 58 manholes, and 77 new catch basins. Existing combined sewers will be rehabilitated as needed in preparation of transitioning these sewers to separate sanitary sewers.

This work requires construction of a 12-inch high-density polyethylene temporary sanitary sewer to connect the drainage area to the existing NSI until the future NSIT is completed. Once the NSIT is completed, sanitary flow will be conveyed to the tunnel through a drop shaft and the temporary sanitary sewer and NSI will be abandoned. Stormwater flow will continue to the Cuyahoga River through the existing 30-inch CSO pipe and outfall which will be rehabilitated using CIPP lining.

Tree clearing will be necessary for installation of portions of the new sewer infrastructure, primarily adjacent to Riverside Drive, near the existing CSO pipe and outfall. Restoration of disturbed surfaces (e.g., paved roads, culverts, driveways, sidewalks, lawns, lawn strips, etc.) is included.

Implementation

Akron proposes to borrow \$7.5 million from the Ohio WPCLF at the standard rate of 3.28 percent (interest rates are set monthly and may change for the requested February award date) to cover construction costs and previous design costs for this project. Borrowing WPCLF funds at this rate could save Akron roughly \$2.97 million over the 45-year loan term compared to the current market rate of 4.43 percent.

The debt associated with this construction project will be recovered from monthly user charges. The average annual sewer bill for residents served by Akron is \$750. This is 1.9 percent of the median household income for Akron (MHI; \$38,739) and compares similarly to the Ohio average annual sewer bill of \$749.

The sewer charges for Akron customers are driven by the total indebtedness of Akron and annual operation and maintenance costs as opposed to the specific indebtedness of any one particular project. Akron does not intend to enact a special rate increase to pay for this project; instead, rate increases were previously implemented to fund Akron's overall sanitary sewer and CSO reduction program.

Public Participation

Public outreach pertaining to sewer improvements in this portion of Akron began in early 2020 when extensive field work to plan for the NSIT and related projects was occurring. Throughout this time,

Akron has used letters to residents, councilperson newsletters, videos, door hangers, yard signs, social media posts, press releases, public council meetings, and other means to inform the public of ongoing progress.

Additionally, Akron operates the Akron Waterways Renewed! program, an initiative to control CSO events and update the city's sewer infrastructure. Information on this program and Akron's many sewer projects can be found on the following website: <https://www.akronwaterwaysrenewed.com/>.

Ohio EPA is unaware of controversy about or opposition to this project. Ohio EPA will make a copy of this document available to the public on the following webpage and will provide it upon request: <https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>.

Conclusion

The proposed sanitary sewer separation project is a wastewater and stormwater system infrastructure construction and improvement project that qualifies for a Limited Environmental Review (LER) and meets the following additional criteria for an LER:

Will have no significant environmental effect, will have no effect on high-value environmental resources, and will require no specific impact mitigation. Construction will primarily take place within a developed neighborhood in Akron within paved roads, sidewalks, lawn strips, and front lawns where there is no suitable habitat for state and federally listed threatened and endangered species, terrestrial and aquatic habitat, and other sensitive environmental resources. A small tree-covered area north of Riverside Drive will require clearing for installation of sewer infrastructure. Akron will restrict tree clearing to between October 1st and March 31st to avoid potential impacts to state and federally listed threatened and endangered bat species.

Located near this same area of the project is the Chuckery Race, a site listed on the National Register of Historic Places (NRHP). The portion of the Chuckery Race that this project overlies has previously been disturbed and filled. Therefore, this project is expected to have no adverse effect to the NRHP Chuckery Race. There are otherwise no identified historic resources within the project area, and due to extensive ground disturbances from development of the neighborhood and associated infrastructure in the other portions of the project area, this project is unlikely to affect intact archaeological resources.

Is cost effective. Prior to selection of the alternative described here within, Akron originally intended for the Rack 34 sewer area wastewater and stormwater sewer system to remain combined and be connected to the future NSIT. Combined flows would be conveyed to the NSIT via a drop shaft and flows in excess of the NSIT capacity would overflow to the Cuyahoga River at the existing overflow. After further consideration, Akron determined it most cost effective to instead separate the Rack 34 sewer system as this alternative will reduce the amount of stormwater that reaches Akron's WRF for treatment, reducing operating costs, reducing the necessary size of the drop shaft to connect the Rack 34 sewer area to the NSIT, reducing the NSIT construction cost, and resulting in greater environmental and safety benefits by eliminating entirely CSO events from the Rack 34 sewer area.

Is not a controversial action. Akron does not intend to enact a special rate increase to pay for this project; instead, rate increases were previously implemented to fund Akron's overall sanitary sewer program. Akron has reported no opposition to this project and has addressed residents' concerns during public meetings and via phone.

Does not create a new or relocate an existing discharge 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 existing population. This project involves the separation of the Rack 34 sewer area combined sewer system which, other than having the beneficial effects of eliminating the discharge of combined wastewater and stormwater to the Cuyahoga River from the Rack 34 sewer area and reducing the amount of stormwater conveyed and treated at the WRF, will not otherwise affect Akron's sanitary sewer collection or wastewater treatment system (e.g., collection, treatment, discharge, service area, etc.).

To conclude, Akron's proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. The planning review identified no potentially short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources (e.g., surface waters, coastal zones, floodplains, wetlands, state-designated scenic and recreational rivers, prime and unique agriculture lands, aquifer recharge zones, archaeological and historically significant resources, threatened and endangered species, and state and federal wildlife areas). Rather, completion of this project will reduce the number of combined sewers in Akron's sanitary sewer system and eliminate combined sewer discharges from the Rack 34 sewer area, contributing toward Akron's reduction of CSO events in the system.

Contact information

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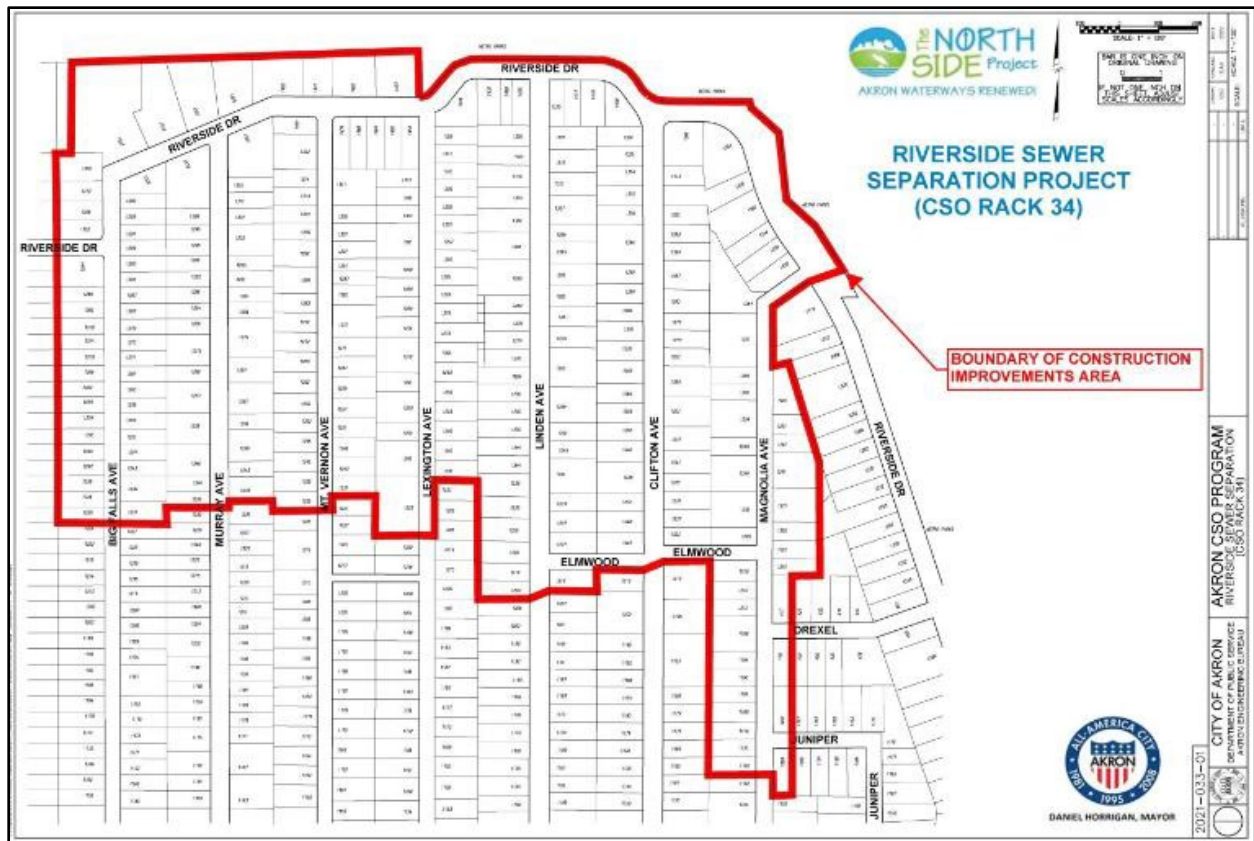


Figure 2. Rack 34 sewer area construction boundary. This figure and other project information is available on the following Akron Waterways Renewed! webpage: <https://www.akronwaterwaysrenewed.com/project/northside-project>.