



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

November 17, 2022

Limited Environmental Review and Finding of No Significant Impact

**Appalachia Ohio Alliance –Morrow County
Alum Creek Poston Farm Project
Loan number: WR391662-0021**

The attached Limited Environmental Review (LER) is for a water quality preservation and protection project in Morrow County which the Ohio Environmental Protection Agency intends to finance through its Water Resource Restoration and Protection Program (WRRSP). 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 WRRS 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,

A handwritten signature in cursive script that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

WRRSP Project: Alum Creek Poston Farm

Applicant: Appalachia Ohio Alliance
P.O. Box 1151
Logan, Ohio 43138

WRRSP Loan No.: WR391662-0021

Project Sponsor: Akron Sanitary Sewer Reconstruction 2021 Large Diameter Lining

WPCLF Loan No.: CS390095-0236

Project Summary

Appalachia Ohio Alliance (AOA) seeks \$1.5 million in funding through Ohio EPA's Water Resource Restoration Sponsor Program (WRRSP) to contribute towards the purchase, enhancement, and protection of both sides of three stream corridors, including approximately 2,430 linear feet of Alum Creek, 2,960 linear feet of the West Branch of Alum Creek, and 1,240 linear feet of an unnamed primary headwater tributary of Alum Creek. This site is in Peru and Kingston Townships, in Morrow and Delaware counties (figures 1 and 2). The City of Akron will sponsor the Alum Creek Poston Farm project through a Water Pollution Control Loan Fund (WPCLF) loan administered by Ohio EPA's Division of Environmental and Financial Assistance (DEFA). Funds for the Alum Creek Poston Farm project will be provided by advancing a portion of the interest to be paid by the City of Akron on its \$8.6 million sewer rehabilitation project. Akron is scheduled to be awarded WPCLF funding in December 2022 and qualifies for the standard interest rate of 3.31% for a 45-year loan. By voluntarily agreeing to sponsor the Alum Creek Poston Farm project, Akron may receive up to a 0.1% reduction on its WPCLF loan rate.

The purpose of the WRRSP is to counteract the loss of ecological function and biological diversity that jeopardizes the health of many of Ohio's water resources. In the program, entities such as park districts and land conservancies (implementers) undertake ecologically restorative and protective projects. Borrowers from the WPCLF voluntarily sponsor such projects in return for interest rate discounts. Ohio EPA foregoes a portion of the interest that borrowers would repay to the WPCLF and advances it to implementers to carry out the ecologically beneficial projects. Properties are acquired, restored and managed in perpetuity under a management plan and an environmental covenant, which establishes use restrictions on the land.

History & Existing Conditions

Alum Creek is 58 miles long, originating in Morrow County and flowing southerly through Delaware County into Franklin County, where it flows into Big Walnut Creek, a Scioto River tributary, in Three Creeks Metro Park. All the Franklin County reaches of Alum Creek are highly urbanized while the Delaware County reaches are urbanized or suburbanizing.

The upper Alum Creek watershed, above Alum Creek Lake (Figure 1), has been impacted by intensive agricultural use and the absence of widespread public wastewater treatment, although overall water quality in most of the upper portions of Alum Creek achieves a Warmwater Habitat (WWH) use.

Increased development is expected in the corridor in future years and will replace agricultural uses as the Columbus metro area continues to grow and expand into greenfield spaces. This will create new adverse impacts if not properly managed. A new wastewater treatment plant that will discharge into the creek is also planned. This will address unsewered areas and the potential environmental contamination but is a prelude to increased development in the project area. Increased development will pose threats to stream habitat, including stream modifications via encroachment, and increased loadings of suspended sediment that will result in substrate degradation, and hydromodification via conversion to urban and suburban land uses.

This Poston Farm property is located adjacent to Alum Creek in a largely rural area which has been facing rapidly increasing development pressures from the growth and expansion of the Columbus metro area and its proximity to the popular Delaware County development zone. The creek corridors in the Poston Farm area retain significant intact forested areas and high-water quality, creating an opportunity for protection and assembly of a large, functional conservation riparian corridor and a large block of connected, intact natural habitat. The Poston property's highly diverse habitats, such as steep ridges, shale slopes, meadows, forests, and floodplains, provide for an incredibly rich flora across the site. Over 420 species of plants have been identified at the site, including several noteworthy species, as well as several listed breeding neotropical migrant songbirds and bat species using the site. The highest water quality in Alum Creek is found along this stretch of the stream.

Protection of the proposed Poston farm property, at a key location at the confluence of Alum Creek and West Alum Creek, is the first step in assembling a larger conservation corridor. It is part of a block of over 450 acres owned by the Poston and DiNovo families which are potentially available for conservation, providing an opportunity to quickly assemble a large block of habitat along the stream. In addition, other property owners in the area are believed to be receptive to conservation initiatives, providing opportunities to create a bigger, continuous, and unfragmented corridor.

Project Description

AOA will utilize WRRSP money towards the purchase of the 160.8-acre Poston Farm property to protect both sides of three WWH streams and their corridors, including approximately 27 acres of open water lake, 2,430 linear feet of Alum Creek, 2,960 linear feet of the West Branch of Alum Creek, and 1,240 linear feet of an unnamed primary headwater tributary of Alum Creek. There are four small Category 3 forested wetlands, totaling approximately one acre along Alum Creek included on this property that will be protected (Figure 2).

The Poston Farm site is largely forested with areas of relatively mature timber including some 3 to 4-foot diameter trees. Forested areas will be managed for invasive control. The old farm fields on the site will be planted with a native prairie mix. Parts of the field will be managed for forest succession.

The primary goal of this project is to protect Alum Creek, the West Branch of Alum Creek, and the small riparian wetland areas within the project acquisition. Through this project AOA hopes to stimulate a larger conservation initiative in the Upper Alum Creek watershed to protect water quality through permanent conservation of riparian areas and creation of a connected conservation corridor along the waterway and its tributaries. This includes the future acquisition of the adjacent DiNovo property.

Implementation

The WRRSP loan award for Alum Creek Poston Farm project will be made possible through the Akron Sanitary Sewer Reconstruction 2021 Large Diameter Lining project WPCLF loan award, which is scheduled for December 2022. Once WRRSP funds become available, the Poston property will be protected through fee-simple purchase. Appalachia Ohio Alliance will be responsible for the perpetual management of aquatic and natural resources. The Ohio Department of Natural Resources Division of Natural Areas and Preserves will play a collaborative role to assist with stewardship planning, site monitoring and invasive species management.

Public Participation

AOA has an active conservation education and outreach program. It utilizes a range of materials and methods to communicate project awareness and benefits to the public and the community. These include: signage; informational brochures available online; a website page; mail and email correspondence with members and friends; inclusion of project information in AOA materials and presentations; a series of education and outreach programs showcasing the before and after results of projects; hands-on volunteer opportunities that correspond to and compliment the overall site management and enhancement activities proposed; inclusion of various partner organizations and volunteers in site monitoring, research and data collection efforts; presentations to local community groups and schools; and, media outreach with information for articles and stories.

AOA communicates regularly with property neighbors, keeping them informed of stewardship activities and engaging them in stewardship, management, and monitoring of our properties. AOA recognizes that the community must be engaged and that a case must be put forward to the community to develop support for the required and proposed conservation and protection actions. AOA is experienced in developing support for conservation in the broader community and will take steps to meet with various community and opinion leaders and work to establish broader awareness and support.

DEFA will post this LER and Finding of No Significant Impact to its web page located at <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements>.

Conclusion

Ohio EPA conducts environmental reviews of all projects prior to awarding WPCLF financing. The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is a water quality protection and enhancement project consisting of non-structural practices. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will require no specific impact mitigation as the planning activities for the project identified no potential adverse impacts to the quality of the human environment or to sensitive resources such as floodplains, wetlands, state or federally-designated wild, scenic or recreational rivers, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, air quality or threatened or endangered species. In fact, the proposed project will have beneficial environmental impacts by preserving and restoring high quality wetland and stream habitat.

Will have no effect on high-value environmental resources since it will improve the quality of streams and wetlands by permanently protecting and addressing impairments to water resources.

Is not a controversial action as it will benefit the environment and no significant public opposition has been expressed.

Does not create a new or relocate an existing discharge to surface or ground waters since the proposed project does not involve a point-source discharge.

Will not provide capacity to serve a population substantially greater than the existing population since the proposed project is not a publicly owned wastewater treatment works designed to serve a designated area. Instead, it is a restoration and protection project of high-quality aquatic resources.

Contact info

Linda Merchant-Masonbrink, Environmental Planner
Ohio EPA, Division of Environmental and Financial Assistance
P.O. Box 1049
Columbus, Ohio 43216-1049
Linda.merchantmasonbrink@epa.ohio.gov

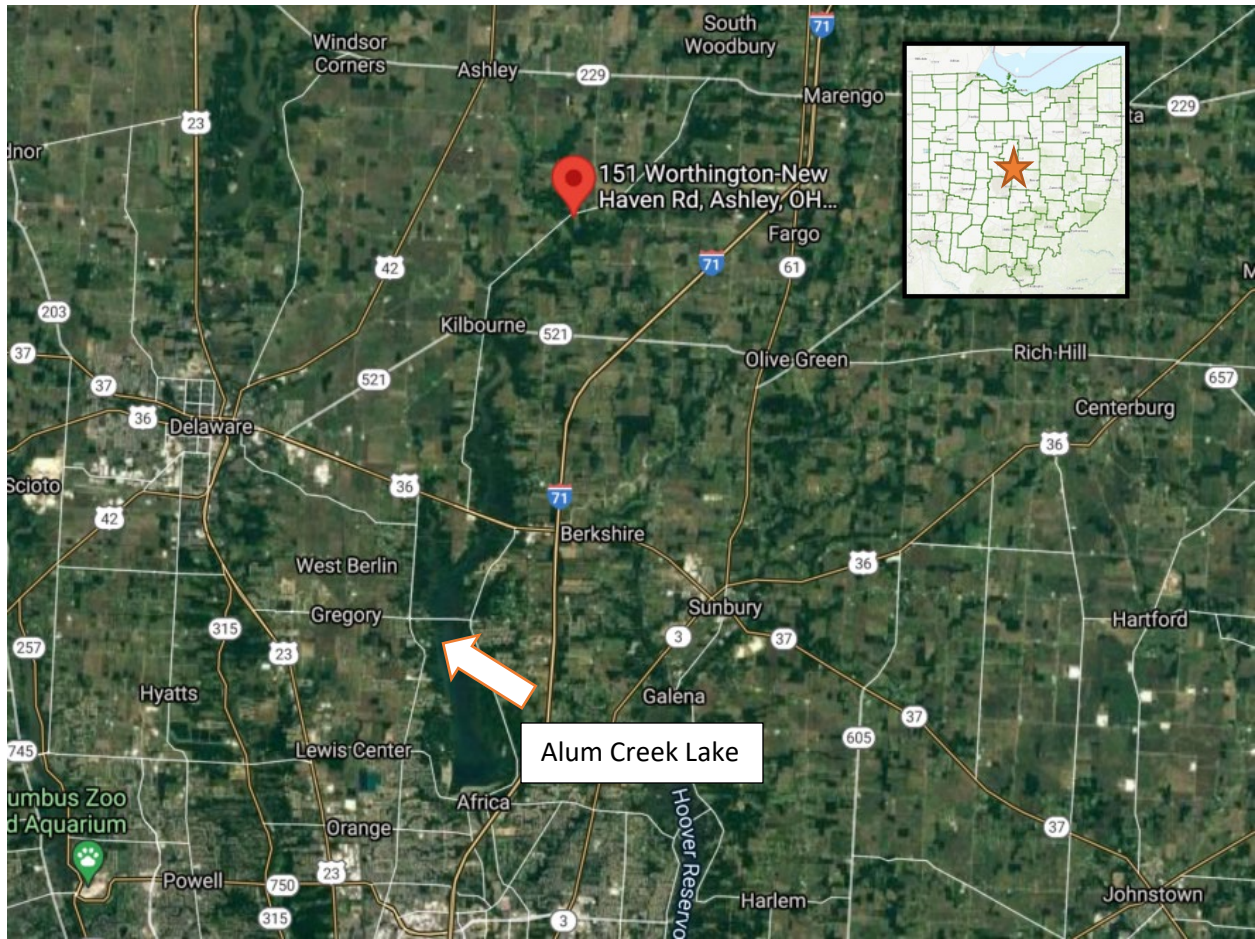


Figure 1. Location of Alum Creek Lake

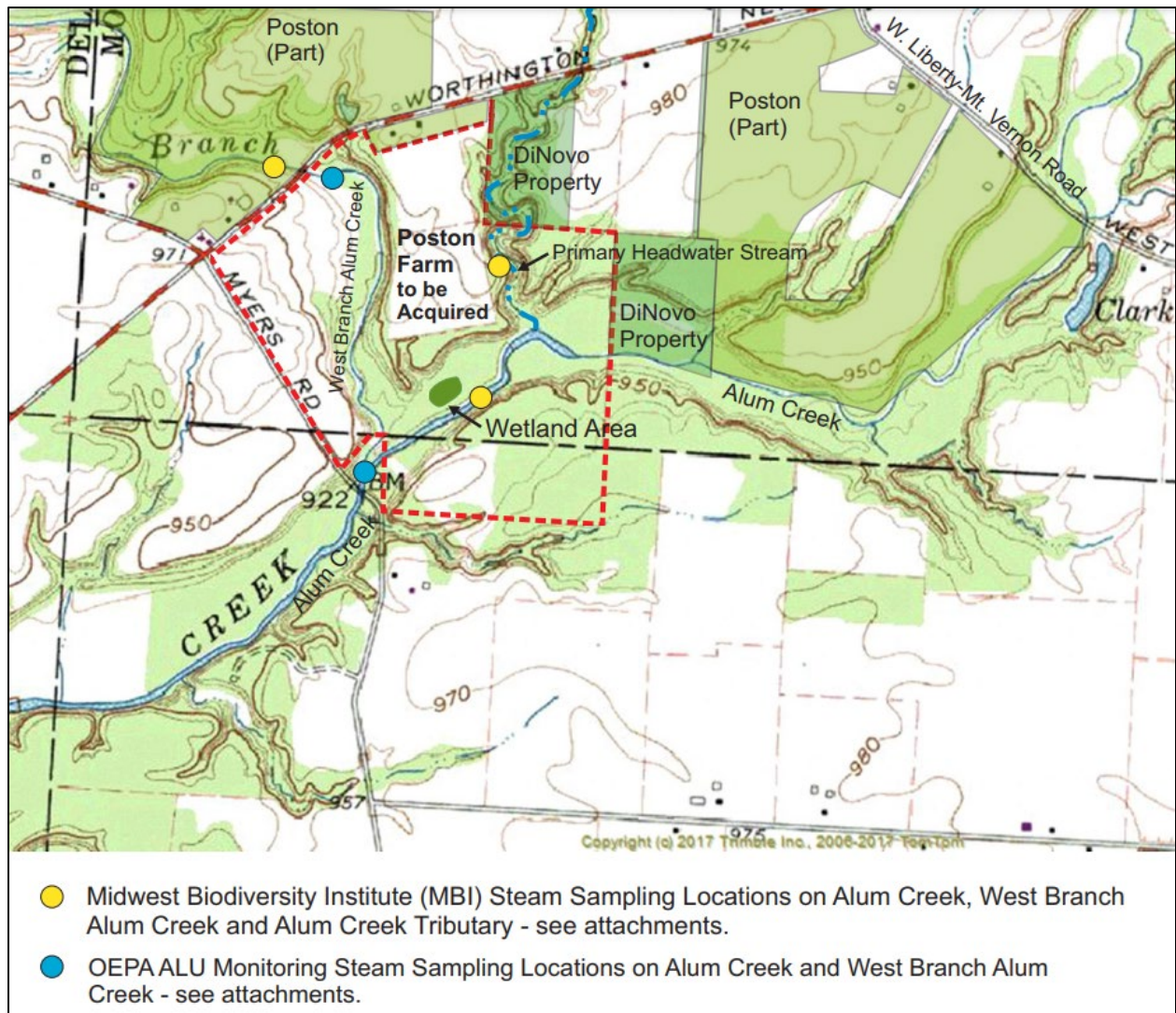


Figure 2. Poston Farm covenant area showing aquatic resources