



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

JUNE 21, 2017

FINDING OF NO SIGNIFICANT IMPACT
TO ALL INTERESTED CITIZENS, ORGANIZATIONS,
AND GOVERNMENT AGENCIES

LORAIN COUNTY'S PHEASANT RUN LIFT STATION AND FORCE MAIN PROJECT
WPCLF LOAN # CS390047-0016

The purpose of this notice is to seek public input and comments on Ohio EPA's preliminary decision that a Supplemental Environmental Study is not required to implement the recommendations discussed in the attached Environmental Assessment of a wastewater facilities plan submitted by the entity mentioned above.

How were environmental issues considered?

The Water Pollution Control Loan Fund program requires the inclusion of environmental factors in the decision-making process. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed alternatives in its review and approval process. Environmental information was developed as part of the facilities plan, as well as through the facilities plan review process and during site inspections. The Agency's preliminary Environmental Assessment found that the project does not require the preparation of a Supplemental Environmental Study.

Why is a Supplemental Environmental Study not required?

Our environmental review concluded that significant environmental impacts will not result from the action. Any adverse impacts have either been eliminated by changes in the facilities plan or have been reduced by the implementation of the mitigative measures discussed in the attached Assessment.

How do I get more information?

A map depicting the location of the project is included as part of the Environmental Assessment. The Environmental Assessment presents additional information on the project, alternatives that were considered, impacts of the action and the basis for our decision. Further information can be obtained by calling or writing the contact person listed in the back of the Environmental Assessment.

How do I submit comments?

Any comments supporting or disagreeing with this preliminary decision should be submitted to me at the letterhead address. We will not take any action on this facilities plan for 30 calendar days from the date of this notice in order to receive and consider any comments.

What happens next?

In the absence of substantive comments during this period, our preliminary decision will become final. The entity will then be eligible to receive loan assistance from this agency.

Please bring any information that you feel should be considered to our attention. We appreciate your interest in the environmental review process.

Sincerely,



Jerry Rouch, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

A. Project Identification

Name: Lorain County, Pheasant Run Wastewater Lift Station and Force Main Project

Address: Mr. James R. Cordes, County Administrator
Lorain County
226 Middle Avenue
Elyria, OH 44035

Loan No.: CS390047-0016

B. Project Overview

Lorain County, through its County Administrator and Sanitary Engineer, has nominated the above-referenced lift station and force main project for Water Pollution Control Loan Fund (WPCLF) financing through Ohio EPA's Division of Environmental and Financial Assistance (DEFA). The main purpose of this proposed project is to replace the failing Pheasant Run Association's wastewater treatment plant (WWTP) and parts of its collection system with a new lift station, retrofitted equalization basins, and new force main to convey the project area's wastewater for treatment to the Village of LaGrange's WWTP, which is scheduled to be expanded during the next 12 months (see Figure 1). In so doing, it will also address the findings and orders issued by Ohio EPA to the Pheasant Run Association. Based in part on a pending inter-municipal service agreement between LaGrange and Lorain County and recent activities completed by the Northeast Ohio Areawide Coordinating Agency (NOACA) and Ohio EPA to amend the Clean Water Act (CWA) Section 208 plan for a portion of Lorain County, this proposed project is consistent with the regional water quality management plan for this part of northeast Ohio.

In the following document, the proposed lift station, equalization basins, and force main project needed to provide a long-term solution to the project area's wastewater needs is described in more detail. In addition, the proposed project's potential environmental impacts are presented, along with maps and photos to illustrate the conditions of the project area, where needed.

According to Lorain County's engineering consultant, the proposed project mainly consists of installing 23,522 lineal feet (lf) of force main through a rural-residential area using horizontal directional drilling technology and road rights-of-way (ROW). In addition, 24 lf of gravity sewer at the northern end of the project is needed to tie the force main into LaGrange's collection system, and will be completed using an open-cut trench. A 0.199 million gallons per day (mgd) average daily flow (adf) lift station with a peak capacity of 0.96 mgd has been designed to handle the expected 20-year needs of the project area. Lorain County and its consultants expect that the

population of the project area shown in Figure 1 will grow by about 56 percent over the next twenty years. Demolition of the existing WWTP will be completed as part of this proposed project, along with conversion of specific final clarifier tanks to serve as the needed southern equalization basins. The existing equalization tank will serve as the northern equalization basin upon project completion. More detailed information on this proposed project's scope can be found in the "Selected Alternative" section of this document. Construction of the proposed project is expected to require about one year to complete.

Based on the consulting engineer's construction cost estimate prior to taking bids, the county projects that the construction cost of the project will be about \$2,481,600 and that the total project cost, including planning, design, and construction inspection will be about \$2,938,651. All of these relevant costs will be financed through a WPCLF loan with a thirty-year term. Please see Table 1 and the "Local Economy" section of this document for more information on the project's costs. The county expects to repay its anticipated WPCLF loan with revenues collected from its residential wastewater customers in the form of assessments and annual sanitary sewer fees. Current estimates are that the county's complete project will cost each property owner between \$8,800 and \$14,700 per lot. Expressed as an annual equivalent cost, this assessment figure is equal to about \$376 per year in annual debt service. Adding the county's already scheduled annual fee to cover the project's annual operation, maintenance, and replacement (OM&R) expenses (\$288 per household) brings the estimated total annual sanitary service charge to \$664, or about 1.26% of Lorain County's latest median household income figure of \$52,610.

In addition to the project components summarized above, the proposed project will entail temporary erosion and sedimentation controls during construction, adherence to other routine environmental impact mitigation (including county and Ohio EPA review of all excess excavated material site disposal locations used during this project, and the county's required frac-out/horizontal direction drilling implementation plan), and final site restoration. Water quality conditions in the Black River watershed, especially in Wellington Creek and its tributaries downstream from Ponderosa Pine Lake's dam, are expected to benefit from this proposed project. Readers interested in the potential environmental/socio-economic impacts of this proposed project and specific impact mitigation information should refer to the "Project Implementation," "Environmental Impacts," "Public Participation," and "Local Economy" sections of this document. Overall, the environmental review of this proposed project conducted by Ohio EPA described in this document indicates that the proposed project is not expected to result in significant adverse direct or indirect environmental impacts.

C. Existing Conditions

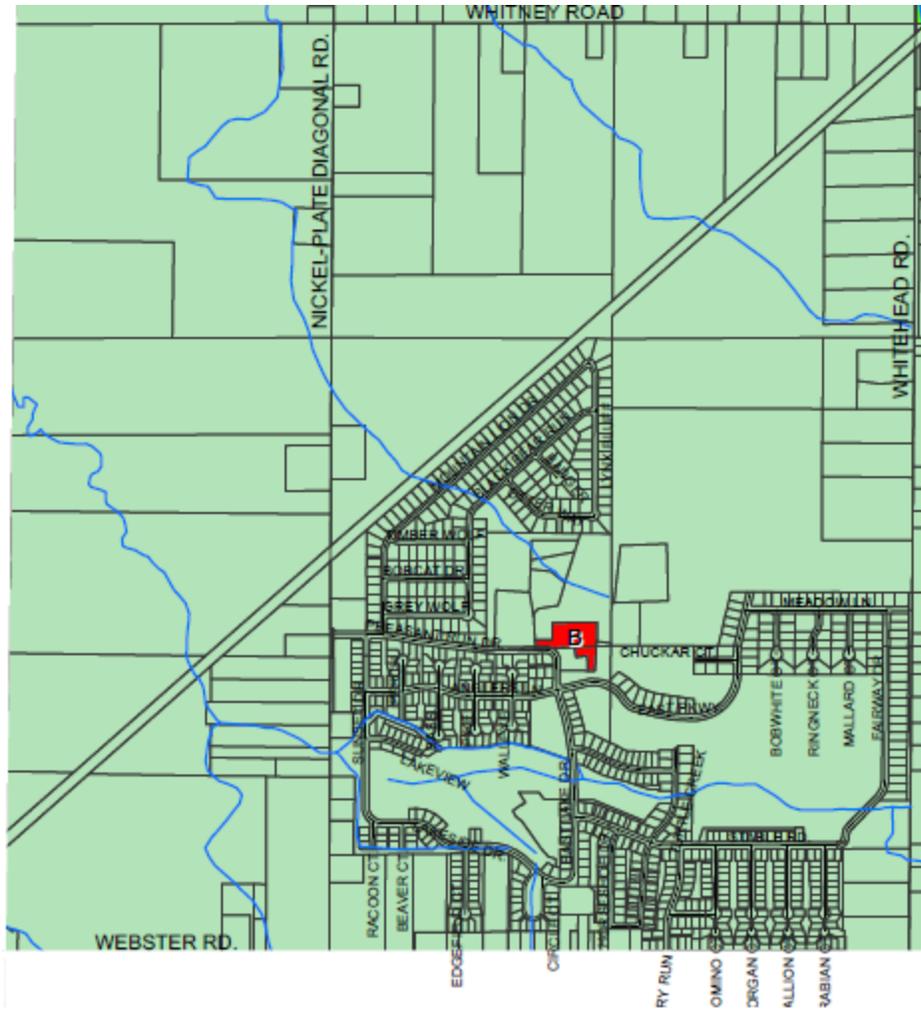
Within the generally rural-residential area and subdivision shown in Figure 1, the Pheasant Run Association currently owns and operates a wastewater collection system and extended aeration WWTP serving its residential sanitary sewer

customers. More specifically, the association relies on its 32,000 lf of gravity sanitary sewer mainlines to convey wastewater collected from homes to its 0.12 mgd extended aeration package plant to process the project area's wastewater before discharge to an unnamed tributary of Wellington Creek. High amounts of infiltration/inflow (I/I)¹ in the collection system and entering the WWTP are the primary focus of the planning effort leading to this project. For example, on an average dry-weather day, flows entering the association's WWTP are about 0.124 mgd. In contrast, on a wet-weather day, flows typically exceed 1.5 mgd. Please see Figure 2 for a map of the immediate project area. The best available information suggests that the association's collection system was installed in 1972 and consist of 115 manholes in addition to the main lines. There is no comparable information available for construction of the WWTP or sewer laterals leading from individual homes to the main sewers.



Figure 1, Pheasant Run Project Area Map

¹ Infiltration/inflow is defined as extraneous, clear water that enters a sanitary sewer system through surface or subsurface locations. Inflow may include clear water entering the system through manhole covers, roof or foundation drains, direct storm sewer connections, etc. Infiltration usually occurs when clear water enters the system below ground through cracked or broken pipes and manholes, poorly sealed or misaligned pipe joints, damaged or poorly connected sewer laterals, etc.



Zoning Designations

| | |
|---|--------------------------------|
|  | A Residential - Agricultural |
|  | B Business & Commercial |
|  | I Industrial |
|  | R-1 Medium Density Residential |
|  | V Village of LaGrange |
|  | FP Floodplain |

Figure 3, LaGrange Township Zoning Map for Pheasant Run Project Area

E. Project Planning and Discussion of Feasible Alternatives

During the planning for the Pheasant Run Association project area’s lift station and force main project completed between December 2015 and April 2016, the county’s consulting engineers evaluated four major alternatives for wastewater service.² The costs of these options are presented below in Table 1.

| Alternative | Project Cost | Present Worth 20 Year Period |
|---|--------------|------------------------------|
| No. 1 – Minimal Wastewater Treatment Improvements with Collection System Rehabilitation | \$233,000 | \$3,621,000 |
| No. 2 – Lift Station to Regional Treatment Plant (LaGrange)* | \$2,563,000 | \$2,652,000 |
| No. 3 – Packaged Plant System | \$3,281,000 | \$4,389,000 |
| No. 4 – Lift Station to Wellington WWTP | \$4,284,000 | \$4,864,000 |
| * Selected Alternative | | |

Given the Ohio EPA’s Findings and Orders issued over the past decade, and because a no-action option would not address the underlying problem needing attention, the county never considered a no-action alternative. As a result, Alternative No. 2 with its lowest present-worth cost was selected for implementation.

Readers should also note there are no known unsewered areas adjacent to the Pheasant Run project area experiencing problems treating wastewater from individual homes, so planning could focus on the immediate project area’s solution to its WWTP problems.

Finally, due to concerns expressed by township officials about the surface impacts that an open-cut trench construction method could have on the area along the proposed force main alignment shown in Figure 5, the county only considered a horizontal directional drilling approach to be feasible. The only narrow exception to this is the use of boring and jacking to cross the one railroad along the force main alignment. Otherwise, this latter technique was not considered for the entire length of the force main project’s installation. On this basis, non-monetary concerns were a key element in the county’s choice of a horizontally directionally drilled force main solution to the wastewater treatment needs facing the Pheasant Run project area.

² On May 19, 2014, the Pheasant Run Association’s board met with project area residents and examined two options: regionalizing with the Lorain County Rural Wastewater District (LORCO) of Wellington, or with the county. By the end of the meeting, the board decided to proceed with the “county” option entailing county ownership of the collection system and 4.5 miles of force main in contrast to the LORCO option of board ownership of the collection system and 8.0 miles of force main.

On this basis, Lorain County has provided sufficient documentation in its planning reports that it evaluated reasonable, feasible alternatives for addressing the problems facing the Pheasant Run WWTP project area. Information on the sewer rehabilitation portion of the county's overall solution to the problems facing the Pheasant Run Association project area can be found in the Limited Environmental Review document covering that aspect of the overall project and available from the contact named below.

F. Selected Alternative

The county's proposed solution to the wastewater problems in the Pheasant Run Association project area consists of installing one lift station, retrofitting two of its WWTP components to serve as equalization basins, laying 23,522 lf of eight-inch diameter force main using horizontal directional drilling technology within road ROW, and installing 24 lf of twelve-inch diameter gravity sanitary sewer. The new 0.199 mgd adf lift station will be built northeast of the existing Pheasant Run WWTP, while the new force main will transfer sewage from the former Pheasant Run WWTP site 4.45 miles to LaGrange's WWTP, and entail five relatively short, narrow, and perpendicular major creek crossings (see Figures 5 and 6 below).

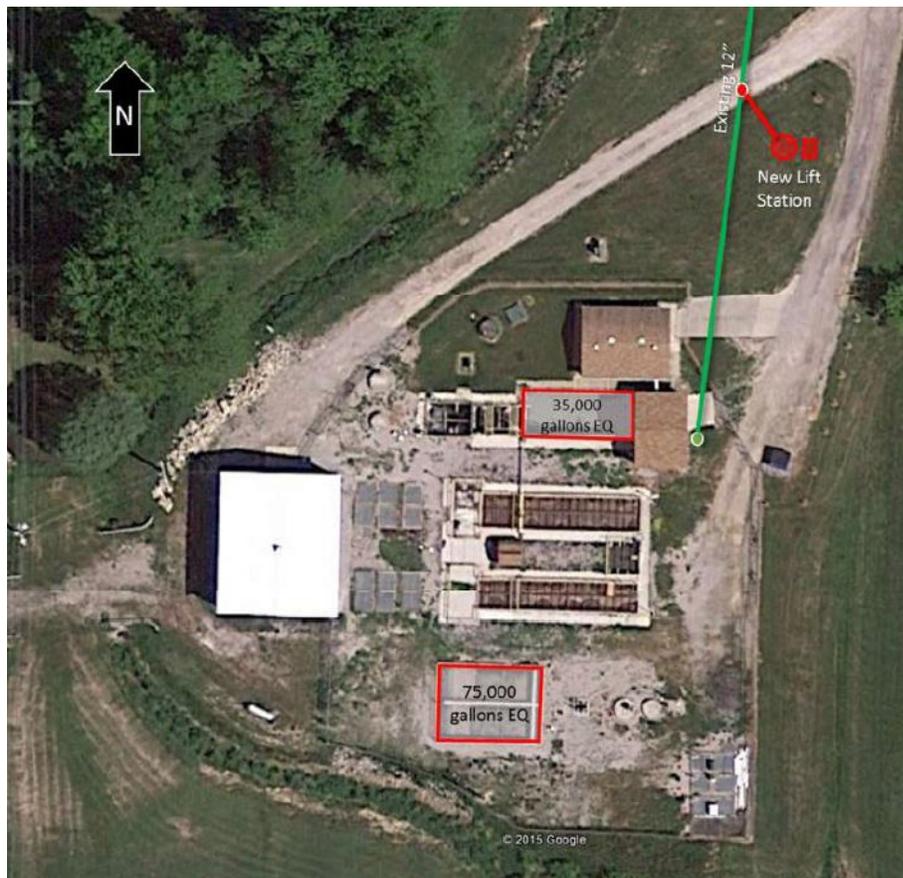


Figure 5, Proposed Pheasant Run Lift Station and Retrofitted Equalization Basins

Within the project area, construction activities will be limited to prior-disturbed WWTP sites, existing road ROW, areas underneath private drives, and areas underneath village streets. Vegetation in the project area includes forested stream corridors, street trees, farm fields, and potentially small areas of wetlands.

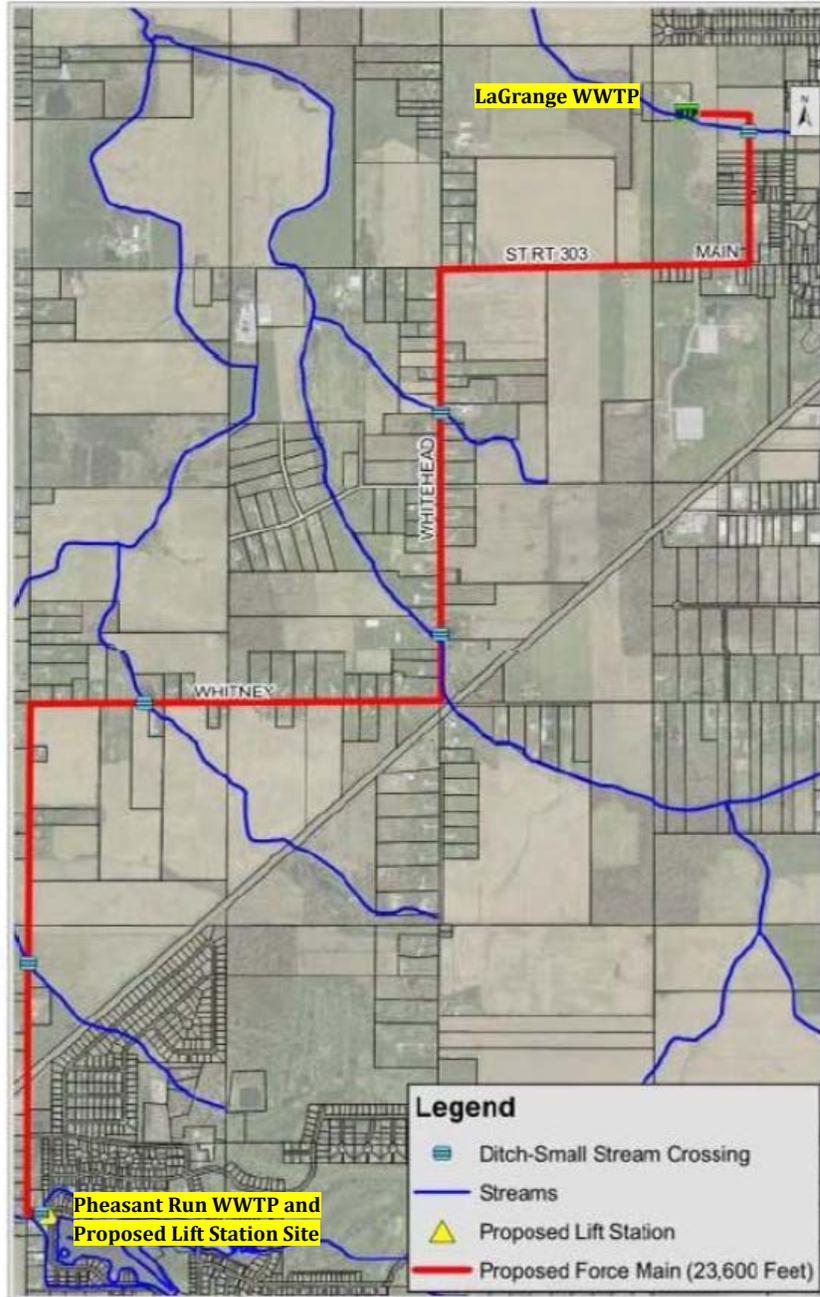


Figure 6, Lift Station Site and Force Main Alignment to LaGrange

Based on the county's selected alternative, Ohio EPA expects that the impacts associated with the construction of this proposed project can be satisfactorily mitigated by the provisions in the contract documents and the required storm water

permit. For more information on the possible environmental impacts of each project and the means to mitigate them, please refer to the “Environmental Impacts” section of this document.

G. Project Implementation

The county expects to borrow the entire project cost of \$2,938,651 (of which \$2,654,381 is the estimated construction cost) from the WPCLF at a small community interest rate of 1.71 percent payable over 30 years. The estimated annual debt service associated with this project after construction will be about \$125,629. WPCLF loan award is anticipated in July 2017. Construction will be initiated in August 2017 or later and take twelve months to complete, ending in August 2018 or later.

As indicated above, this project involves assessments of property owners ranging between \$8,800 and \$14,700 per lot to pay for the proposed project. Additional context for this proposed project's related economic impacts can be found in the following "Environmental Impacts" section of this document.

H. Environmental Impacts of the Selected Alternative

The environmental review conducted in part by Ohio EPA and other review agencies, described herein, indicates that the proposed improvements in the Pheasant Run Association project area should not result in significant, adverse direct or indirect environmental impacts on the area shown in Figures 1-6 above.

Mitigation has been proposed by Lorain County and its engineering consultant to reduce the direct, indirect, and cumulative impacts that were identified and to comply with the terms of any necessary storm water permits. More specifically, they include, at a minimum, appropriate provisions in the contract documents covering (1) prohibited construction activities, (2) erosion/sediment control, (3) traffic control, (4) air pollution/noise control, (5) tree and vegetation protection, (6) dewatering, and (8) archaeological and historical resources. Specific information on each of these topics can be found within this section of this document. In particular, close attention was paid to mitigating releases of bentonite (horizontal directional drilling mud), should they occur, into streams and wetlands along the force main alignment. Please see the aquatic habitat impact part of this section below for more information. Where there is any potential for direct impacts on any resources or environmental attributes, an analysis can be found below in the following summary of Ohio EPA's environmental reviews.

Secondary and cumulative impacts to the natural and human environment can result from population growth and residential and commercial development that are induced by the extension of utilities into undeveloped areas. These impacts can include the addition of impervious surfaces and attendant increases in storm water runoff, additional demands on local ground water supplies, further loss of wetlands

and stresses to endangered species and their critical/suitable habitat. The county's proposed project, however, is intended primarily to address existing and future wastewater treatment needs within the previously disturbed Pheasant Run project area (subdivision, golf course, and adjacent Ponderosa Pine dam and lake), and not to serve growth and development along the proposed 4.45-mile force main alignment. Thus, the project, as designed, should have no adverse indirect or cumulative impact on the above noted features. It will also not result in the conversion of farmland or induce changes outside LaGrange Township's current zoning regulations and codes (see Figure 3).

Overall, Lorain County's proposed project is not expected to result in any significant, direct or indirect adverse environmental impacts for the reasons cited below.

1. Topography, Grading Activities, and Soils

Given that the purpose of Lorain County's proposed project is mainly to replace a failing WWTP with a lift station, equalization basins, and an eight-inch diameter, 4.45-mile, shallow depth, force main using an HDD installation method within a generally previously disturbed landscape, no significant changes in site grading, hydrology, or area soils are expected. Thus, the direct impacts of this proposed project on this environmental attribute will not be significant following its completion, and the restoration of pre-construction topography at the lift station/equalization basin site shown in Figure 5, and near the excavations for the HDD entry and exit holes for the proposed force main. As a condition of Ohio EPA project approval, the contractor will need to grade and/or restore disturbed areas to their original appearance.

Current estimates are that there will be no excess excavated material generated by this proposed project, because of the county's selection of an HDD installation technology. However, should there be any release of bentonite or other material during this project, a contingency plan is required by the contract documents to assure proper disposal of this material outside of floodplains and wetlands consistent with federal, state, and local laws and regulations. On this basis, no significant direct, indirect, or cumulative impacts on significant natural features are expected to occur during disposal of this material.

As all stockpile sites and contractor equipment laydown areas are required to meet applicable storm water pollution prevention plan requirements, no adverse impacts from this part of the project are expected. To conclude, no significant, direct, adverse impacts from site grading or area soils are expected to result from this proposed project as defined above. Local zoning should help guide future development within the specific project area shown in Figure 3 above.

2. Surface and Ground Water

➤ Surface Water

The proposed installation of Lorain County's lift station and equalization basins within the generally previously-disturbed area shown in Figure 5 and eight-inch diameter force main within the corridor shown in Figure 6 above, suggests that the county's proposed project should not result in any significant, adverse, direct environmental impacts on the five or so surface water resources within the project area. Most specifically, the use of the horizontal directional drilling technique, and a short amount of boring and jacking at the railroad crossing along Nickel Plate Diagonal Road, is expected to avoid surface water and wetlands impacts during the force main installation and crossing of these features.

Also, standard mitigative measures (e.g., perimeter silt fences and timely seeding of bare soil areas) to address storm water runoff, erosion, and sedimentation impacts during the proposed one-year long construction period, plus the county enforcing prohibited construction activities over this same timeframe, should help assure that no significant, adverse environmental impacts to surface water resources occur. Important to the success of these measures is the requirement that the contractor install and maintain appropriate erosion and sedimentation controls (e.g., silt fences, storm water inlet protection, trench and excavation dewatering, temporary and permanent seeding and mulching, etc.), in accordance with all applicable storm water pollution prevention and erosion control plans in the contract documents.

Prohibited construction activities include disposing of spoil material removed from any excavations to previously disturbed areas with the prior approval from Ohio EPA. As a condition of Ohio EPA's project approval, should there be any excess soil generated during the county's proposed project that cannot be returned to excavations, none of it can be used to fill any wetlands, depressions, or floodplains.

These assurances are also intended to minimize the amount of sediment that directly enters the storm sewers in those parts of Lorain County's project area where prior disturbance has already modified local site conditions. As a result of these provisions, Ohio EPA anticipates that no significant, adverse, direct impacts on surface water features will result from the county's proposed project.

Based on the above information, there should be no significant, short-or long-term, direct or indirect, adverse impacts to surface water resources as a result of the construction of the county's proposed lift station, equalization basins, and force main installation project.

➤ Ground Water

Ground Water Amounts: Soil boring data collected for specific locations from the proposed Pheasant Run Lift Station site to the LaGrange WWTP site where the county's force main will terminate suggests that ground water is not expected to be encountered during the shallow force main directionally drilled excavations. However, the data for the lift station site's deeper excavation (between 18.5 and 21 feet below grade) indicates that ground water may be encountered during excavations to about 15 feet below grade in the seasons of the year when ground water levels are typically closer to the surface.

Ground Water Dewatering: Given the presence of ground water during the soil boring at the lift station site at a depth of 18.5 to 21 feet, Ohio EPA expects that dewatering of the lift station site may be necessary. However, by following standard storm water permit provisions for dewatering activities (such as requiring that all dewatering flows be filtered before discharge to any storm sewers or other stabilized sites), this aspect of the proposed project should not result in any adverse effects on short- or long-term ground water amounts within the project area, or on area residents. This conclusion was reached primarily because residents rely on county water for their potable water supplies and thus any dewatering activities conducted should not adversely affect anyone's wells during this part of the project. Further support for this conclusion is that any discharges of dewatered flows will be monitored to avoid the release of contaminated ground water, sediment laden water, or water that is colder than surface water to the environment. Once construction is successfully completed, any dewatering activities will cease, and ground water levels will begin to return to their pre-construction levels.

Based on the above, the proposed project should not result in significant, short-or long-term, direct adverse environmental impacts to ground water quality or quantity.

In addition to no direct effects on ground water, the proposed project should also not indirectly affect any ground water resources through either related infrastructure improvements or property development. The main reason for this conclusion is that the project area already relies on county water for drinking water supplies, not private wells, and so any development that this proposed project helps facilitate should not result in any corresponding increase in ground water use or noticeable change in its quality. Overall, no adverse effects on ground water quality or quantity are expected to result from this proposed project.

3. Aquatic, Terrestrial, and Critical Habitat, including Floodplains and Wetlands

➤ Aquatic Habitats

During the planning and design of this proposed project, the five major small creek crossings (see Figure 6), three minor ditch crossings, and a few, potential small wetlands were the subject of more detailed reviews by Ohio EPA for possible direct aquatic habitat impacts. Given the horizontal directional drilling technique proposed to be used to install the county's force main between the proposed lift station site located within the 500-year floodplain and the LaGrange WWTP shown on Figure 6, Ohio EPA focused its review on a contingency plan to cover possible releases of bentonite (directional drilling mud) into the environment. By the county requiring a contractor-prepared HDD implementation plan and including the following mitigative measures statements in the detail plans, Ohio EPA has concluded that this proposed activity should not result in any significant, short- or long-term adverse impacts to aquatic habitats found in the project area:

* Subsurface Conditions Information. The contractor shall provide the county with documentation that he/she has evaluated sufficiently the proposed drilling site in terms of its subsurface conditions (the physical and engineering properties of the material to be penetrated) in advance of the drilling to properly specify and report the drilling parameters for the site (i.e., fluid viscosity, fluid content, fluid density, drilling pressure, drilling rate, and drilling depth), and to help ensure as problem-free a drilling operation as possible.

* Resident Inspection. The contractor shall provide a resident inspector, familiar with horizontal directional drilling work, to monitor the horizontal directional drilling site, particularly the line of the bore hole during set-up, active operation, and shut-down. This person, in cooperation with the owner's inspector, will need to monitor all areas around the directional drilling site to check for accidental releases of bentonite drilling mud to the environment (frac-outs) and to check the amount of bentonite material being reclaimed from the drilling hole.

* Stand-by containment and clean-up equipment. In case of a frac-out (the release of bentonite drilling mud into the environment during directional drilling), the contractor will need to have standing by (available on an on-call basis) a vacuum truck and pumps (one for operations, the other as stand-by), and/or other equipment as appropriate, to remove the bentonite material from the release site and to clean up the site to acceptable levels. When drilling under environmentally sensitive sites, such as flowing streams or wetland areas, frac-out containment and clean-up equipment should be kept on site.

* Stand-by containment and clean-up materials. Should a frac-out occur, containment materials such as silt fence and sand bags need to be available on-site to prevent the further spread of the bentonite mud into any streams and wetlands within the project area.

* Spilled bentonite drilling mud disposal site location(s). All waste disposal sites, including any site needed for disposing of any frac-out material that cannot be reused, need prior approval from both Ohio EPA and Miamisburg before use by the contractor.

* Ohio EPA Contact – If an illegal discharge of material occurs, the spill or release will be reported to Ohio EPA by first calling 1-800-282-9378 and then contacting the Division of Environmental and Financial Assistance at 614-644-2798.

For the part of the project at the Pheasant Run WWTP where site demolition, equalization basin retrofitting, and lift station construction will be completed, the only aquatic habitat present nearby is one stream. Standard storm water pollution prevention plan components are expected to address any of the potential aquatic habitat impacts associated with these activities. With completion of this project and elimination of the discharge from the Pheasant Run WWTP, water quality in the unnamed stream currently receiving poorly treated effluent from that facility is expected to improve.

Based on these assumptions, implementation of a HDD installation plan with a frac-out contingency plan and adherence to a storm water pollution prevention plan is expected to ensure that appropriately timed site restoration activities occur and that aquatic habitats experience no significant, short-or long-term, direct adverse environmental impacts during this project.

➤ Terrestrial Habitats

Aside from the street trees and trees found at the five creek crossings previously discussed, as shown in Figure 6 above, no other sensitive terrestrial habitat resources are found in the project area, including the existing Pheasant Run WWTP site. With HDD installation of the proposed force main, no impacts on these terrestrial habitat features are expected. On this basis, Ohio EPA expects that no significant, short-or long-term, direct adverse environmental impacts to terrestrial habitat are expected.

In summary, these findings for aquatic (streams and wetlands) and terrestrial (upland) habitats are the basis for Ohio EPA's determination that the county's proposed lift station, equalization basin, and force main project will have no significant, direct, adverse environmental effects on any unique terrestrial or aquatic habitat features. Similarly, the available project area

information provided in the facilities plan concerning any future residential development and used to assess the potential for indirect and cumulative impacts, indicates that significant indirect or cumulative impacts are not likely to occur during future development of the overall project area. Of the three, relatively small potential wetlands identified within the Pheasant Run project service area (see Figures 1 and 2), federal and state wetlands regulations are expected to adequately address any potential indirect impacts to these aquatic resources.

➤ Critical (Suitable) Habitat and Endangered Species

According to the Ohio Department of Natural Resources' (ODNR) Division of Natural Areas, ODNR's Division of Wildlife, and the U.S. Fish and Wildlife Service (US FWS), and with the proposal to install the county's force main using HDD techniques, the project area shown in Figures 1-6 does not support suitable habitat for any federally-listed endangered or threatened species that could be adversely affected by this proposed project. This includes habitat for the Indiana bat, Northern long-eared bat, the Kirtland's warbler, and three bivalve mollusks found in larger streams within Lorain County, but not in the small streams shown in Figure 1 and Figure 6. Accordingly, Ohio EPA has concluded that no significant impacts on any federal or state, endangered, threatened, or special concern animals or plants are likely to occur during the proposed project's construction.

4. Land Use (including Open Space) and Agriculture

Based on a review of this proposed project and existing township zoning for the project area (see Figure 3), Ohio EPA has concluded that the project should have no significant direct, indirect, or cumulative adverse effects on either land use or agriculture production. Rural residential and medium density residential are the primary zoning designations for the immediate project area and along the force main alignment.

5. Air Quality

Air pollution levels in the project area in southern Lorain County mirror those in Lorain County as a whole. Since the entire county is now in full attainment with air quality standards for all six major ("criteria") air pollutants except for fine particulates (PM 2.5), Ohio EPA has concluded that the county's proposed project will have no significant, adverse, direct, indirect, or cumulative impacts on air quality. This conclusion is supported by the air quality provisions in the detail plans and specifications. For example, given that the proposed project is expected to be completed over the twelve months generally within existing traffic corridors and developed areas, the projected increase in heavy truck traffic is expected to be relatively temporary. With the mitigation proposed for fugitive dust control and proper tuning and maintenance of emission controls on heavy equipment, this

relatively short-term increase in construction equipment activity should not result in any significant, adverse, short- or long-term impacts on air quality. In addition, use of dust control measures (such as water and calcium chloride) and prompt mulching, reseeding, and repaving of disturbed areas in reasonable sections should limit dust generation to relatively low levels, as well as minimize soil erosion and sedimentation of area waterways.

Ohio EPA supports the conclusion that this proposed project is consistent with the objectives of water quality planning under the CWA (see NOACA's web site and Figure 4), and with the State of Ohio's State Implementation Plan under the Clean Air Act. These assurances also indicate that any projected future growth in the project planning areas should not induce adverse indirect environmental impacts on air quality. A positive benefit of this proposed project will be the elimination of odors associated with the existing Pheasant Run WWTP.

6. Noise, Traffic, Aesthetics, and Safety

The contract specifications and detail plans for Lorain County's proposed project provide adequate mitigation to address potential year-long noise, traffic, and aesthetic concerns from truck traffic and other heavy equipment use. By implementing control measures such as keeping construction equipment properly operating between 7:30 AM and 4:00 PM, preventing construction activity during evening and nighttime hours, and providing traffic detours as needed while maintaining limited access in construction areas, no significant, direct project effects on noise, traffic, and aesthetic levels should occur. Overall, noise levels and traffic patterns are expected to return to pre-construction levels once the county's proposed project is completed. By eliminating the Pheasant Run WWTP, Ohio EPA expects that Lorain County's proposed force main project will improve the overall aesthetics of the project area in the long-run.

Finally, provisions have been included in the contract documents to protect workers' and residents' safety during the construction of this project. Compliance with the traffic control plan in the contract documents and provisions covering handling of toxic materials or hazardous substances will help ensure this, along with meeting the terms of the specifications in the Ohio Department of Transportation's Manual of Uniform Traffic Control Devices.

7. Energy Use

Based on the information provided by the county, construction of its proposed lift station, equalization basins, and force main project is not expected to require a significant amount of non-renewable energy. As such, the planned one-year construction period, with its energy use in the form of fuel consumption, is an unavoidable and necessary aspect of this proposed project if the wastewater needs of the project area are to be addressed. On this basis, no significant, short- or long-

term adverse environmental impacts on energy use are expected to result from the construction activities involved in the county's project.

In contrast to the prior conclusion about construction related energy use, energy to operate the proposed lift station and force main at the current Pheasant Run WWTP site will require a long-term, permanent commitment. This commitment is in the form of electricity to run the lift station and a back-up generator to maintain the operation of these proposed facilities and keep wastewater from escaping into area streams, or nearby streets and neighborhoods in the project area. Thus, this feature of the proposed project is an unavoidable, long-term aspect of the overall project. However, as these energy demands are expected to be comparable to the operation of the Pheasant Run WWTP, Ohio EPA anticipates the actual energy use should be consistent with the operation of other wastewater facilities of this type and not a significant draw on local sources.

To conclude, the operation of the proposed lift station and wastewater force main is not expected to have any significant short- or long-term adverse effects on the production and availability of non-renewable energy, or the air pollution energy production creates within this context. This conclusion was reached primarily because the energy demands from these new facilities are expected to be within the range of electrical energy already currently available.

8. Archaeological and Historic Resources

Ohio EPA's review of the county's proposed wastewater improvements project found that this proposed project as shown in Figures 5 and 6 will not adversely affect archaeological and historic properties. The basis for this conclusion is that Ohio EPA has reviewed the proposed alignment emphasizing road rights-of-way and, given the proximity of other utility lines, buildings, and roadways, concluded that the alignment chosen for this project also appears to be prior-disturbed. Accordingly, the potential to find any as-yet undiscovered, archaeological and historic resources eligible for the National Register of Historic Places within the project corridor appears low.

Should any of these resources appear during the project's construction, the detail plans include the necessary provisions for the contractor to stop work and coordinate with the State Historic Preservation Office. Ohio EPA concurs with this approach. On this basis, any direct or indirect impacts on these types of resources should not be adverse.

9. Local Economy

As documented earlier, the proposed project is tied to improving how the county serves the project area shown in Figure 2 through installing a new lift station and force main, and retrofitting existing WWTP components into two equalization basins, and not primarily to serve residential growth and development. With a

county has appropriately involved the public in the decision-making process for its proposed wastewater improvements project.

J. Reasons for a Preliminary Finding of No Significant Impact

Based upon our review of Lorain County's project planning information and the materials presented in this Environmental Assessment, Ohio EPA has concluded that there will be no significant adverse direct impacts from the county's lift station and force main as it relates to the environmental features discussed previously. Through avoidance and/or proper restoration of the most environmentally-sensitive areas, obtaining and adhering to the necessary permits, and the use of mitigative measures described in this document, the impacts from the project's construction should generally be relatively short-term and insignificant. Any indirect or cumulative impacts from these projects should be addressed by on-going county and township initiatives to implement zoning concepts and storm water controls, as well as enforcement of existing federal and state regulatory frameworks under the federal Clean Water Act, Endangered Species Act, and existing state law.

K. For further information, please contact:

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