



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

June 28, 2019

Limited Environmental Review and Finding of No Significant Impact

**City of Defiance – Defiance County
Group 9.1 & 9.3 Inflow Reduction
Loan number: CS390305-0036**

The attached Limited Environmental Review (LER) is for a sewer separation project in Defiance, 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,

A handwritten signature in blue ink, appearing to read "Jonathan Bernstein", is written over a horizontal line.

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: City of Defiance – Group 9.1 & 9.3 Inflow Reduction

Applicant: Jeffery Leonard, City Administrator
631 Perry Street
Defiance, Ohio 43512

Loan Number: CS390305-0036

Project Summary

Located in Defiance County, the City of Defiance has requested approximately \$2,134,324 from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance combined sewer separation work for the Group 9.1 and 9.3 Inflow Reduction projects to eliminate routine combined sewer overflows.

History & Existing Conditions

The City of Defiance is located in northwest Ohio (see Figure 1). The City has a 20-year strategy to separate its combined sewers, with an end goal of “substantial separation” as defined in the City’s long-term control plan (LTCP). To accomplish this, extensive evaluation of the collection system was necessary. The City originally constructed combined sewers in the 1880’s; in the 1950’s, it began constructing interceptor sewers to transport wastewater to its new WWTP for treatment.

Updated in July 2015, the City’s LTCP evaluated system-wide strategies to control combined sewer overflows (CSOs). Combined sewers are those designed to convey both sanitary sewage and storm water flows in the same pipe, transporting the combined flow to the City’s wastewater treatment plant (WWTP). During rain events, when storm water entering the combined sewers exceeds the pipe capacity, a portion of the combined sewage flows untreated through CSO diverters into the Maumee River or Auglaize River. These overflow structures help minimize backups in basements or sewer surcharging through manholes during heavy rains.

Project Description

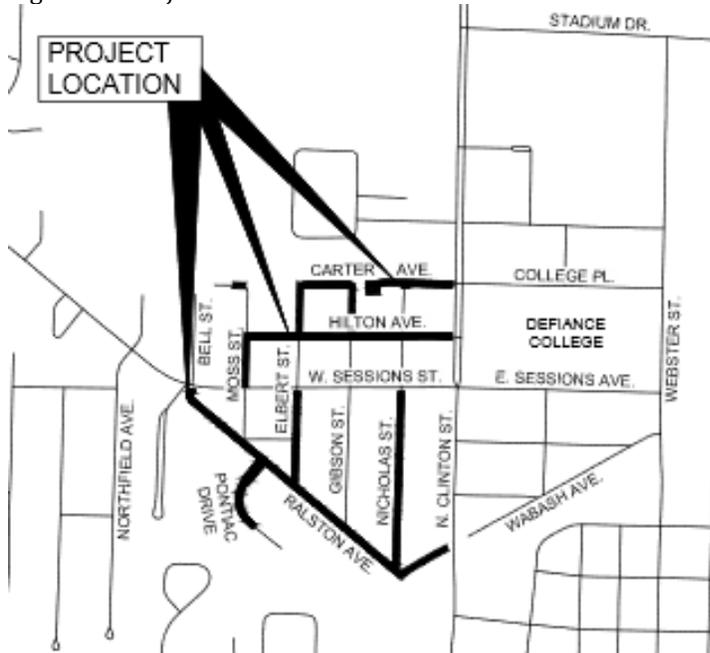
Based upon system flow monitoring and modeling completed during development of the LTCP Update, the Group 9.1 and 9.3 area was recommended as a targeted area for inflow reduction. The Group 9 project area is located on the north side of the city (Figure 2). The area is generally bounded to the south by Pontiac Drive, to the north by Carter Avenue, to the east by Nicholas Street and to the west by Bell Street. The area identified as Group 9.1 includes drainage areas along Ralston Avenue, Elbert Street, and Moss Street. The area identified as Group 9.3 includes drainage areas along Hilton Avenue and Carter Avenue. The area consists of moderately dense residential development with commercial buildings and residential complexes along Ralston Avenue. The local sewers, flowing towards Clinton Street, are combined. Extensive investigations of the area during development of the LTCP Update identified approximately 40 combined sewer structures that should be separated. The storm sewers will discharge directly to a tributary of the Maumee River.

Group 9.1 project area consists of a new storm line that runs down to the 42-inch storm sewer on the south side of Ralston Avenue to provide for catch basin disconnections from the combined sewer system. Group 9.3 project area consists of two new alignments that eventually connect into the same 24-inch storm sewer on Gibson Street. The northern alignment is proposed to flow along the Carter Street right-of-way and connect into an 18-inch storm sewer on Nicholas Street. The southern alignment flows on Hilton Avenue and also connects into the 24-inch storm sewer on Gibson Street.

Figure 1 – Site Location, City of Defiance



Figure 2 – Project Work Area



Implementation

Defiance proposes to borrow the entire cost from Ohio's WPCLF at the CSO discounted rate of 0%. The total estimated cost is \$2,341,644 and borrowing this amount at 0% over 20 years will save the City \$718,351, compared to the market rate of 2.75%.

Annual sewer rates paid by Defiance's customers will be about \$735/year in 2020, assuming a planned rate increase takes effect. This represents 1.6% of the median household income (MHI) of \$43,855, which is considered affordable.

The City expects loan awards in August 2019 and construction is anticipated to reach completion within eleven months.

Public Participation

The City holds regular public council meetings where this project has been discussed, as well as several other sewer separation projects which resulted from implementation of their LTCP. These discussions include the reasons for undertaking the project, its construction, and the associated costs. For these reasons, the public information and participation opportunities that have been available are considered sufficient.

The City will place a notice of the availability of this Limited Environmental Review (LER) decision and Finding of No Significant Impact (FNSI) for comment on their website. Ohio EPA's Division of Environmental and Financial Assistance will post this Limited Environmental Review (LER) and Finding of No Significant Impact to its web page located at <http://epa.ohio.gov/defa/ofa.aspx> ("WPCLF Documents for Review and Comment").

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is a minor upgrading of existing treatment works including minor rehabilitation of existing facilities that has no potential for associated significant adverse environmental impacts and will have no effect on high value environmental resources. 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 ground disturbing activities will occur in previously disturbed areas within the limits of construction and existing rights-of-way; the new infrastructure will be underground, without permanent alteration of the viewshed; and no historical properties or important cultural resources are located within the construction limits. No residents or businesses will be displaced for the project. Based on review of project planning information and design, there is no indication of other project circumstances which might create a potential for adverse effect to historic properties as a result of these projects.

Road detours and access restrictions due to construction may result in some traffic delays for local residents, businesses, and commuters. However, substantial disruptions are not anticipated as standard construction best management practices will be used to maintain traffic and to control noise, dust, and storm water runoff.

Will have no effect on high-value environmental resources because the project is not located on or near sensitive resources such as floodplains, state or federally-designated wild, scenic or recreational rivers, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, , or in a coastal zone.

The project area is within the range of the endangered Indiana bat and threatened northern long-eared bat. Any trees with a trunk diameter 3” or greater will be cut only between October 1st and March 31st to avoid impacts to these species. Due to the project type, size, and location, no adverse effects to the federally endangered mussels (clubshell, northern riffleshell, white cat’s paw pearly mussel, or rayed bean) or the threatened copperbelly water snake.

Is cost-effective because on a monetary and non-monetary basis, sewer separation and rehabilitation of existing sewers is typically less costly than complete reconstruction.

Is not a controversial action as the focus is on combined sewer overflow reduction which will be beneficial to the community. Ohio EPA is unaware of opposition to the project.

Does not create a new, or relocate an existing discharge to surface or ground waters, and 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 does not involve the installation of a new discharge or relocation of an outfall. Additionally, the project should result in decreased volume of discharges to the Maumee River.

Will not provide capacity to serve a population substantially greater than the existing population because the project is designed to ensure the existing sewers function as designed and not for development or growth in population; therefore, it will have no adverse secondary environmental impacts, such as the conversion of farmland to more intensive uses, which are caused by the extension of public utilities that induce new building development.

Contact info

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