



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

December 26, 2019

Limited Environmental Review and Finding of No Significant Impact

**City of Lancaster – Fairfield County
Fifth Avenue/Sixth Avenue/Forest Rose Avenue Sewer Separation
Loan number: CS90504-0025**

The attached Limited Environmental Review (LER) is for a combined sewer separation and elimination of overflows project in Lancaster 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 black ink, appearing to read "Jonathan Bernstein", is written over a large, stylized circular flourish.

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Lancaster – Fifth Avenue/Sixth Avenue/Forest Rose Avenue Sewer Separation

Applicant: Denise Crews, Stormwater Coordinator
City of Lancaster
121 E. Chestnut Street, Suite 100
Lancaster, OH 43130

Loan Number: CS390504-0025

Project Summary

The City of Lancaster in Fairfield County has requested \$3,735,150 from the Water Pollution Control Loan Fund (WPCLF) for combined sewer separation and elimination of overflows through the construction of new storm sewers.

History and Existing Conditions

The original wastewater system that serves the central part of Lancaster has a combined sewer system, meaning the wastewater collection system carries both sanitary sewage and storm water. As the community grew and expanded outward, separate sewers were constructed for the new areas of development but are routed through the combined system on the way to the Lawrence Street Water Pollution Control Facility (WPCF). These trunk sewers often have combined sewer overflow (CSO) structures that relieve the collection system during wet weather events. There is approximately 48,000 linear feet (LF) of combined sewers and over 900,000 LF of separate sewers in the Lancaster wastewater collection system with a service area of over 18 square miles. The city also maintains approximately 476,000 LF of storm sewers.

When Lancaster started to address their collection system issues in the mid-1990s, there were a total of 31 permitted CSOs. Since that time, all but 9 of the CSOs have been closed as a result of the sewer separation and other improvements in system operation and maintenance. Lancaster completed a Phase II Long Term Control Plan (LTCP II) in August 2014 which outlines projects intended to reduce down to 2-4 CSO events citywide during a typical year.

The Fifth Avenue/Sixth Avenue/Forest Rose Avenue Sewer Separation project was developed as part of the city's LTCP II with the specific goal of reducing CSO overflows at CSO 1012 (Hocking River – Memorial Drive and Fifth Avenue) and CSO 1013 (Hocking River – Memorial Drive and Sixth Avenue) by removing stormwater from the combined sewer system. CSO 1012 is located on the west side of Memorial Drive at Fifth Avenue. A 36-inch diameter combined sewer discharges to the overflow structure that has a 15-inch diameter sanitary sewer underflow and a 36-inch diameter overflow that outfalls to the Hocking River. A weir wall with a height of 5 feet, 10 inches controls the overflow. The outfall sewer has a cured-in-place plastic (CIPP) liner that was installed in 2011. CSO 1013 is located on the west side of Memorial Drive at Sixth Avenue. A 24-inch diameter combined sewer discharges to the overflow that has a 10-inch diameter sanitary sewer underflow and a 24-inch-diameter overflow that outfalls to the river. An overflow wall with a height of 1.65 feet controls the discharge to the overflow.

The underflow sewer was repaired, and a new overflow sewer was installed in 2005.

Project Description

To provide separation of stormwater, this project intends to connect existing curb inlets and catch basins to new storm sewers. The new storm sewers will convey stormwater alongside the existing combined sewer system. The existing sewers will remain in place to convey sanitary sewer to the WPCF.

This project requires construction in an alleyway at the intersection of Fifth North Alley and Plum North Alley to divert storm water runoff from the combined sewer system. To remove this runoff, 290 feet of new 15-inch diameter storm sewer will be connected to an existing storm sewer at Fifth Avenue. The existing 36-inch diameter outfall pipe of CSO 1012 will be utilized for conveying storm water flows to the Hocking River.

The construction footprint for this project will remain within the confines of an existing alleyway, within rights-of-way alongside existing utilities, therefore minimizing effects on environmental resources. The contractor is responsible for best management practices to control erosion and sedimentation and maintain local traffic during construction.

Maps of the project location are provided in the exhibits below.

Implementation

Project Costs

Lancaster plans to borrow \$3,735,150 from the WPCLF. During the 20-year loan period Lancaster will save approximately \$531,686 by using WPCLF dollars at the Standard Long-Term rate of 1.10%, compared to the market rate of 2.35%.

Local Economy

The current Lancaster residential sewer bill is approximately \$105/year, which is approximately 0.2% of the median household income (MHI) of Lancaster, \$40,235. Projected residential sewer bills with the implementation of this project are expected to remain the same.

By using WPCLF financing for this project, Lancaster has minimized the economic impact on customers.

Project Schedule

The anticipated loan award will occur in January 2020. Construction is expected to begin immediately and is expected to be completed by December 2020.

Public Participation

Lancaster has completed extensive outreach for the duration of projects involved in the city's Long-Term Control Plan II. All information pertaining to this outreach is available at a webpage created by the City of Lancaster, at <http://www.ci.lancaster.oh.us/234/Combined-Sewer-Overflows-Project>. Lancaster also created a webpage specifically for this project, available at <http://www.ci.lancaster.oh.us/827/5th6thForest-Rose-Sewer-Separation>. In addition to the website, the public will be updated through city council meetings and the Council Water/Water Pollution Committee. Minutes from both are available on the city website and council meetings are broadcast on both the web and local cable.

Affected property owners will be notified via a letter from the city and the contractor will provide door hangers as construction moves through the neighborhoods to let affected residents know details about the project and that they could be experiencing various inconveniences such as noise, dust, or traffic disruptions. Lancaster will provide updates to the schools and the fairgrounds as needed, and the city's right-of-way permit process provides updates to emergency responders and other city departments.

Reviews of the respective environmental resources were completed by Ohio EPA, Division of Environmental and Financial Assistance. The review agency does not oppose the project.

Ohio EPA will make a copy of this document available to the public on its web page: <http://epa.ohio.gov/defa/ofa.aspx> (Under the "What's New" tab, scroll to: "Documents Available for Review and Comment – WPCLF Documents for Review and Comment") and will provide it upon request to interested parties. Information supporting this Limited Environmental Review (LER) is available from the project contact named below.

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater treatment system, which involves the functional replacement of and improvements to existing mechanical equipment. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

- *Has no significant environmental effect, no effect on high value environmental resources, and does not require extensive specific impact mitigation.*
All project work will occur within existing rights-of-way. No tree removal is planned and no work will occur within wetlands, streams, or floodplains. Construction best management practices are included in the project planning documents to minimize impacts such as erosion and sedimentation, dust, equipment noise, and disruption of local traffic.
- *Is cost effective and not controversial.*
The proposed project is cost-effective as it involves improving upon existing infrastructure to allow for more efficient operation. This project will construct a separate storm sewer to eliminate existing CSOs and, as a result, the WPCF operation costs will decrease and treatment efficiency should improve. The cost of the project will be financed by a low-interest WPCLF loan, saving ratepayers money. Ohio EPA is unaware of any specific opposition to or controversy about this project that will eliminate combined sewer overflows.
- *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.*
The sewer improvements are designed to reduce wet-weather combined flow to the WPCF and eliminate combined sewer overflow to the Hocking River. This project will not increase sanitary sewer system capacity, extend sewers into areas unserved by sanitary sewers, or create or relocate a discharge.

Based upon the available planning information for this project and the materials presented within this LER, Ohio EPA concludes that the proposed project will not result in any significant adverse impacts to any environmental features. The project is expected to have no significant short-term or long-term

adverse impacts on the quality of the human environment or on sensitive resources such as surface waters, coastal zones, riparian areas, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species.

This project will help Lancaster to eliminate combined sewer overflows to improve water quality and protect public health.

Contact

Kristin Parrish
Ohio EPA-DEFA
P.O. Box 1049
Columbus, OH 43216-1049
(614) 644-3662
kristin.parrish@epa.ohio.gov

Exhibit 1: Project Location Map



Exhibit 2: Project Location Map

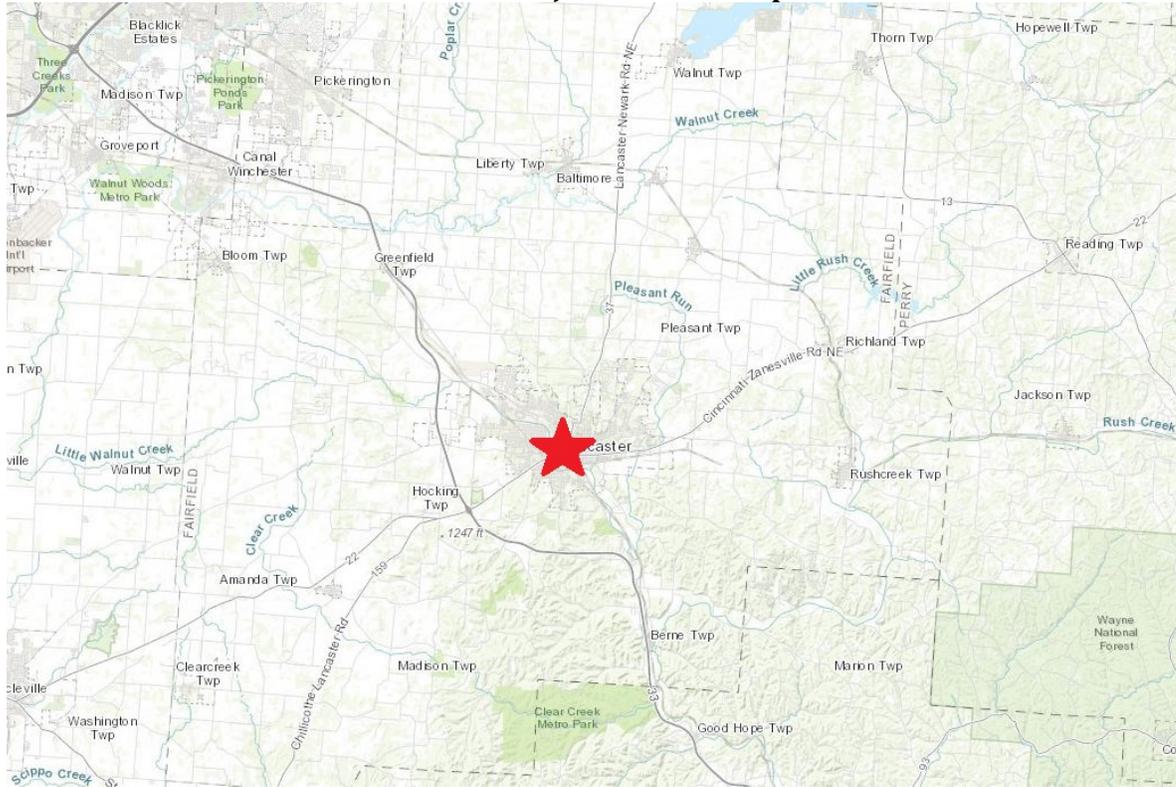


Exhibit 3: Project Location Map

