



September 22, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Cleveland – Cuyahoga County
Bellaire Road Area Sewer Replacement Phase I
Loan number: CS390262-0030**

The attached Limited Environmental Review (LER) is for a wastewater collection project in Cleveland 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,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Bellaire Road Area Sewer Replacement Phase I

Applicant: City of Cleveland
1201 Lakeside Avenue, 4th Floor South
Cleveland, Ohio 44114

Loan Number: CS390262-0030

Project Summary

The City of Cleveland has requested financial assistance from the Ohio Water Pollution Control Loan Fund (WPCLF) for the Bellaire Road Area Sewer Replacement Phase I project. Work for this wastewater conveyance project will primarily include the construction of a new relief sewer and replacement of combined sewers to reduce sewage backups in basements and streets. The total estimated loan amount for the project is \$5,300,000. Debt for the project will be repaid from monthly service charges. The project is scheduled to begin construction in the autumn of 2023 and be completed in 15 months.

History & Existing Conditions

The project area is primarily comprised of urban residential lots, and is served by combined sewers. Property owners in the service area have lodged numerous complaints to Cleveland Water Pollution Control (WPC) of basement flooding and sewer surcharging related to storm events. These backup events are primarily a result of inadequate volume within the project area's sewer system to store and convey wet weather flows for treatment. The city determined that action is necessary to protect the system during high flows and to address the frequency of basement flooding and sewer surcharging. Wet weather overflows occur into Big Creek, downstream of the project area, in part, due to the lack of storage volume in the proposed project area. The project is also expected to decrease peak combined sewer overflows (CSO)¹ to Regulator BC-43, reducing wet weather discharges to Big Creek.

Project Description

The proposed project (see figures 1 and 2) involves the open-cut replacement and upsizing of approximately 2,800 linear feet (LF) of combined sewer on Bellaire Road from West 130th Street to

¹ Combined sewer systems are sewers that are designed to collect rainwater runoff, domestic sewage and industrial wastewater in the same pipe. Most of the time, combined sewer systems transport all of their flow to a sewage treatment plant where it is treated and then discharged to a water body. During periods of heavy rainfall or snowmelt the combined flow volume in a combined sewer system can exceed the capacity of the sewer system or treatment plant. For this reason, combined sewer systems are designed to overflow occasionally (combined sewer overflow) and discharge excess combined sewage directly to nearby streams, rivers or other water bodies.

Grimsby Avenue, and Leeila Avenue from Bellaire Road to Wanda Avenue; and the installation of approximately 1,500 LF of parallel relief sewer along Bellaire Road from Grimsby Avenue to Leeila Avenue. Work will also include manholes, lateral reconnections, and restoration of streets, curbs, driveways, sidewalks, and lawn grass.

The proposed project represents the optimum use of the existing system, as pipes will be replaced with larger sizes, which will act as additional storage within the system. After installation of the proposed system, the existing system's dry weather conditions will remain undisturbed. However, the upsized system will be capable of storing and conveying combined sewage, reducing basement and street flooding in the project area, and also reducing CSOs downstream of the project area.

Flows from the proposed project area are conveyed to the Northeast Ohio Regional Sewer District (NEORS) Southerly Wastewater Treatment Center for treatment, with treated wastewater discharged to the Cuyahoga River.

Implementation

The total estimated construction cost of the proposed project is \$5,300,000, all of which the City of Cleveland proposes to borrow from the Ohio Water Pollution Control Loan Fund (WPCLF). The project service area qualifies for the standard WPCLF below-market interest rate on 20-year construction loans, which for October is 2.88 percent (WPCLF loan interest rates are set monthly, and the rate may change for this loan). Borrowing at 2.88 percent will save Cleveland approximately \$829,000 over the life of the loan compared to the current market rate of 4.13 percent.

Cleveland will recover debt associated with the project with revenue generated by monthly sewer fees. The 2023 monthly residential sewer rate in the project area is \$17.21 (\$207 annually). This is 0.65 percent of the median household income of \$31,838, as compared to the state average of 1.3 percent.

Public Participation

The City of Cleveland has held public meetings to notify residents and businesses about the project, and additional meetings and public notifications will take place shortly after issuance of a construction Notice to Proceed. Fact sheets detailing the project's work and schedule will be distributed prior to the commencement of construction. A public notice announcing the availability of this Limited Environmental Review will be posted on City of Cleveland and Ohio EPA Division of Environmental and Financial Assistance websites. Thus, there have been adequate opportunities for information dissemination and public participation.

Conclusion

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

Will have no adverse environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources, as there are no known sensitive environmental resources within the proposed project area. The proposed work will take place within urban areas,

in which the predominant cover is pavement and lawn grass, with extensive development and prior excavation. Mitigation measures include typical erosion control and construction best management practices.

Is cost effective, as the proposed action was evaluated as the most cost-effective alternative to improve wastewater storage and conveyance within the existing system.

Is not a controversial action, as there is no known opposition to the proposed project and the cost of the project is not overly burdensome to ratepayers.

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 loading of pollutants from an existing source or from new facilities to receiving waters, since the project involves improvements to and replacement of infrastructure to reduce basement backups and discharges of untreated or partially treated effluent .

Will not provide capacity to serve a population substantially greater than the existing population, since the project is not related to serving new growth or increasing capacity at the wastewater treatment facilities.

In summary, the planning activities for the project have identified no potentially significant adverse impacts. 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 (surface water, ground water, air quality, floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, federal or state-designated wild, scenic or recreational rivers, federal or state-designated wildlife areas, or threatened or endangered species). Typical construction impacts, such as noise, dust, and exhaust fumes, will be short-term and addressed through the use of standard construction best management practices.

The proposed project is a cost-effective way to address necessary improvements within an existing, aged, and undersized wastewater collection system. Once implemented, the project will help Cleveland improve its wastewater collection system by replacing and upsizing aged infrastructure, reducing public and environmental health risks related to the discharge of and exposure to untreated wastewater through basement backups, sewer manhole surging, and CSO, improving water quality in the Cuyahoga River and Lake Erie. Also, by using WPCLF low-interest financing, Cleveland has minimized the project cost.

Contact information

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Figure 1: General Project Area

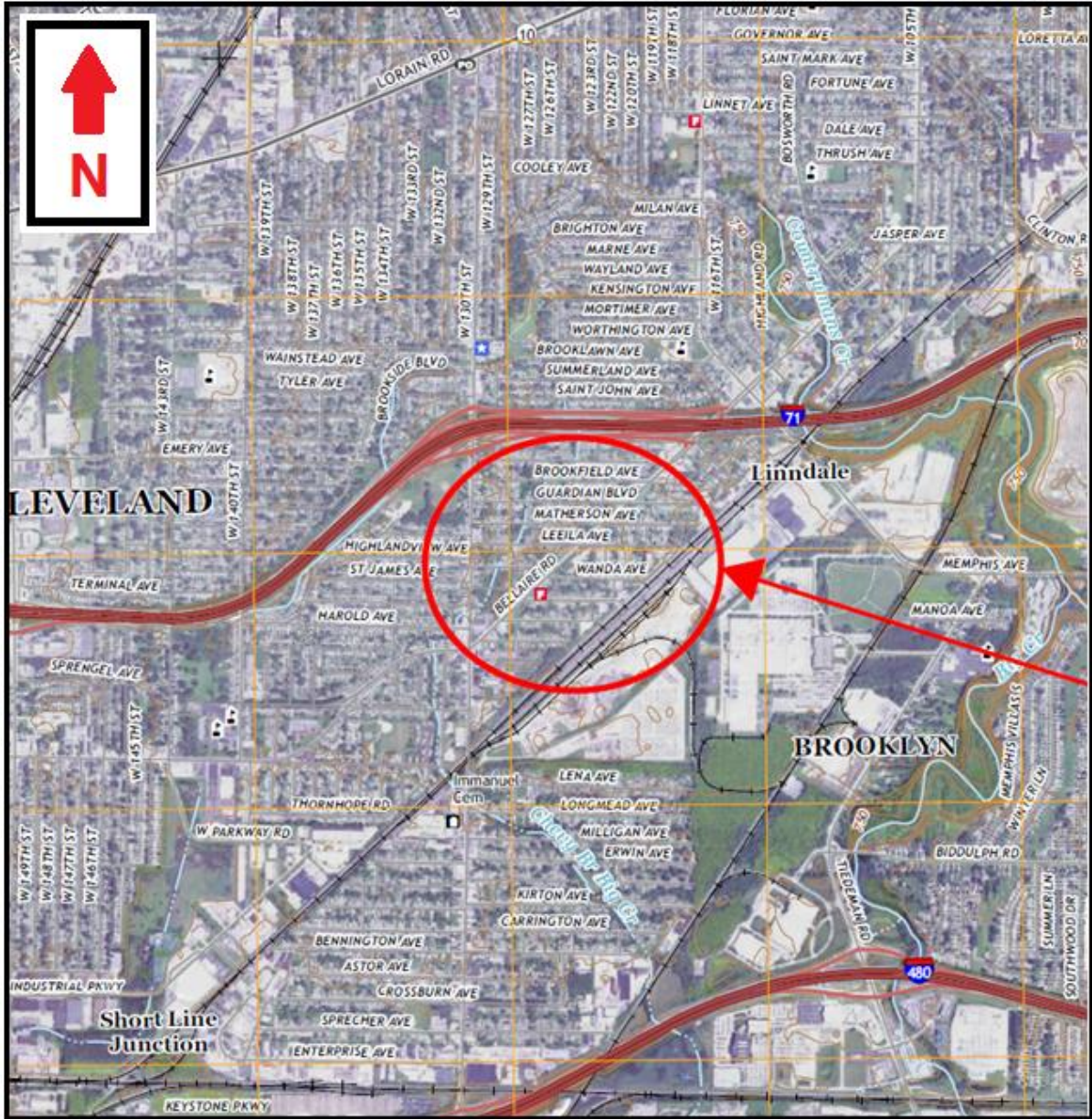


Figure 2: Specific Project Area