



March 29, 2024

Limited Environmental Review and Finding of No Significant Impact

**City of Cleveland Heights – Cuyahoga County
CH-9, CH-32, CH-57, CH-58 SSO Control Project
Loan number: CS390263-0003**

The attached Limited Environmental Review (LER) is for a sanitary sewer overflow reduction project in Cleveland Heights 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,

Steve Malone (for)

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: CH-9, CH-32, CH-57, CH-58 SSO Control Project

Applicant: City of Cleveland Heights
40 Severance Circle
Cleveland Heights, Ohio 44118

Loan Number: CS390263-0003

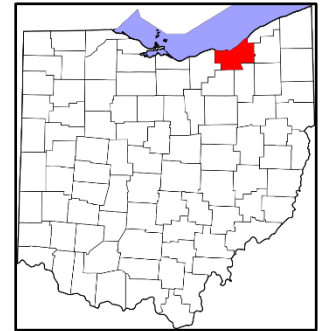


Figure 1. Cuyahoga County

Project Summary

The City of Cleveland Heights, in Cuyahoga County (Figure 1), has requested \$2,806,493 from the Ohio Water Pollution Control Loan Fund (WPCLF) for the CH-9, CH-32, CH-57, CH-58 SSO Control Project. This project consists of redirecting flows to new connection points to control the local sanitary sewer overflows (SSOs) and to reduce the risk of basement backups (BBUs) projected along Fairmount Boulevard. The project is eligible for full principal forgiveness, which is a loan that will not need to be repaid.

History & Existing Conditions

Cleveland Heights is served by a separated sanitary sewer system that flows to Northeast Ohio Regional Sewer District's (NEORS) Easterly Wastewater Treatment Plant on Lake Erie via the Heights Hilltop Interceptor (HHI) system. NEORS owns and operates the interceptor system that serves Cleveland Heights. The Cleveland Heights sewer system serves a population of approximately 46,000.

Cleveland Heights has a common trench sewer system that presents an enormous technical and financial challenge to the long-term renewal of the city's infrastructure. Common trench sewers have sanitary and storm sewers in the same trench. These sewers include two pipes with the storm sewer directly over the sanitary sewer that also share a common manhole. Their sewer system is composed of 87% common trench and 13% separate trench sewers.

As the sanitary and storm sewer pipes have aged and developed defects, the common trench configuration has resulted in high wet-weather flows in the lower sanitary sewers, and potential sewage contamination of stormwater. Leaky common trench sewers can contribute to large amounts of sanitary sewer stormwater infiltration and inflow (I/I) leading to SSOs and BBUs. Cleveland Heights experiences SSOs at manholes CH-9, CH-32, CH-57, and CH-58 and BBUs within the project area (Figure 2).

In 2017, the U.S. Environmental Protection Agency (USEPA) issued a consent decree for Cleveland Heights' violations on discharging water containing raw sewage from point sources within the sanitary sewer system, resulting in SSOs, and violating its general permit by discharging untreated sewage through its storm sewers.

The consent decree required Cleveland Heights to submit an Integrated Overflow Control Master Plan which was completed in 2021. The Master Plan focuses on controlling and eliminating the identified SSOs. Prioritizing SSO control achieves the goals of the Consent Decree. The Master Plan includes a three-tier process to complete the projects. Tier 1 of the SSO control projects will start in 2021 and conclude in 2036. This 15-year duration is critical to maintain ratepayer affordability and utility financial capability, and to continue system improvements in the following years.

Project Description

The purpose of this project is to reduce overflows at three existing SSO locations (Figure 2), by redirecting the flow at new connection points to the NEORS 66-inch sanitary sewer interceptor (HHI) along Fairmount Boulevard (Figure 3). Removing these flows will control the local SSOs at CH-9, CH-32, CH-57, and CH-58 and reduce flows to downstream SSOs at Fairfax and Coventry roads. The improvements will also reduce the risk of BBUs along Fairmount Boulevard.

The project will consist of the installation of:

- 780 linear feet (LF) of 18-inch diameter PVC pipe
- 945 LF of 21-inch diameter PVC pipe
- 1,073 LF of 27-inch diameter PVC pipe.

The proposed sanitary sewers are shown in Figure 4.



Figure 2. SSOs and BBUs in the problem area

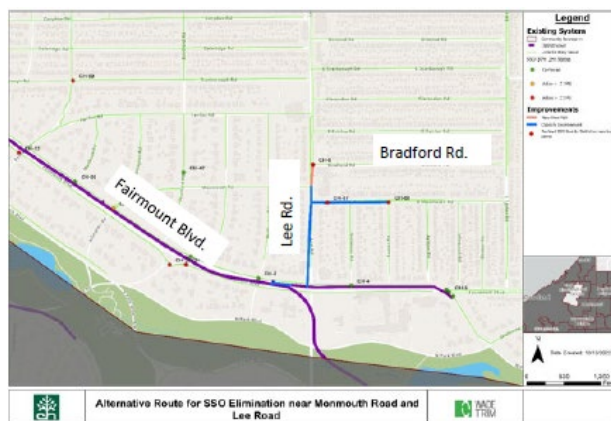


Figure 3. Proposed redirection of flow

Implementation

The City of Cleveland Heights is eligible for the full loan amount in principal forgiveness (loan amount that does not need to be repaid) from the Ohio WPCLF. With this favorable financing, Cleveland Heights will save \$ 4,007,202 compared to financing the entire loan amount at the market rate, 3.73% for a 20-year loan period. Additionally, Cleveland Heights used American Rescue Plan Act (ARPA) funds for the other project stages.

The city indicated that no rate increases are associated with this project. The average annual residential sewer bill for residents will be \$220.08 in 2024. This represents 0.4 percent of the median household income for Cleveland Heights (MHI; \$62,823) and is less than the Ohio average annual sewer bill of \$489.95.

Loan award is anticipated in April 2024, and construction is expected to be complete by 2025.

Public Participation

Cleveland Heights has held multiple public meetings and developed a webpage dedicated to sharing information including reports, recorded public meetings, webinars, and SSO reports: <https://www.clevelandheights.gov/556/Sewer-Partial-Consent-Decree-Information>.

The city also shares information through its email newsletter and published newspaper articles.

Ohio EPA is unaware of significant controversy about or opposition to this project. Ohio EPA will make a copy of this document available to the public on the following webpage and will provide it upon request:

<https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements>.

Conclusion

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

Will have no significant environmental effect, will have no effect on high-value environmental resources and will require no specific impact mitigation. Construction will take place in existing rights-of-way and lawns in developed residential locations that lack important environmental resources. Standard construction best management practices will minimize noise, dust, erosion, sediment, and traffic disruptions.

Is cost effective and not a controversial action. An alternatives analysis for the proposed improvements was completed within the Master Plan and concluded the chosen alternative was the best feasible option. By obtaining WPCLF full principal forgiveness, Cleveland Heights has reduced potential loan costs substantially to minimize sewer bill rate increases for its customers specifically for this project. Ohio EPA is unaware of any controversy about or opposition to this 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, and will not provide capacity to serve a population substantially greater than the existing population. This project will not increase or relocate discharges. Additionally, Cleveland Heights has experienced a continued decline in population; however, the project aims to improve the existing infrastructure for the current population.

Based upon Ohio EPA's review of the planning information and the materials presented in this Limited Environmental Review, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to the environmental features discussed previously. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts will be temporary and mitigated. The proposed project is a cost-effective way to address necessary improvements to existing infrastructure. Once implemented, the project will reduce/eliminate SSOs and BBUs, protecting the health of residents within the area.

Contact Information

Holly Rundle
Ohio EPA-DEFA
PO Box 1049
Columbus, Ohio 43216-1049

holly.rundle@epa.ohio.gov

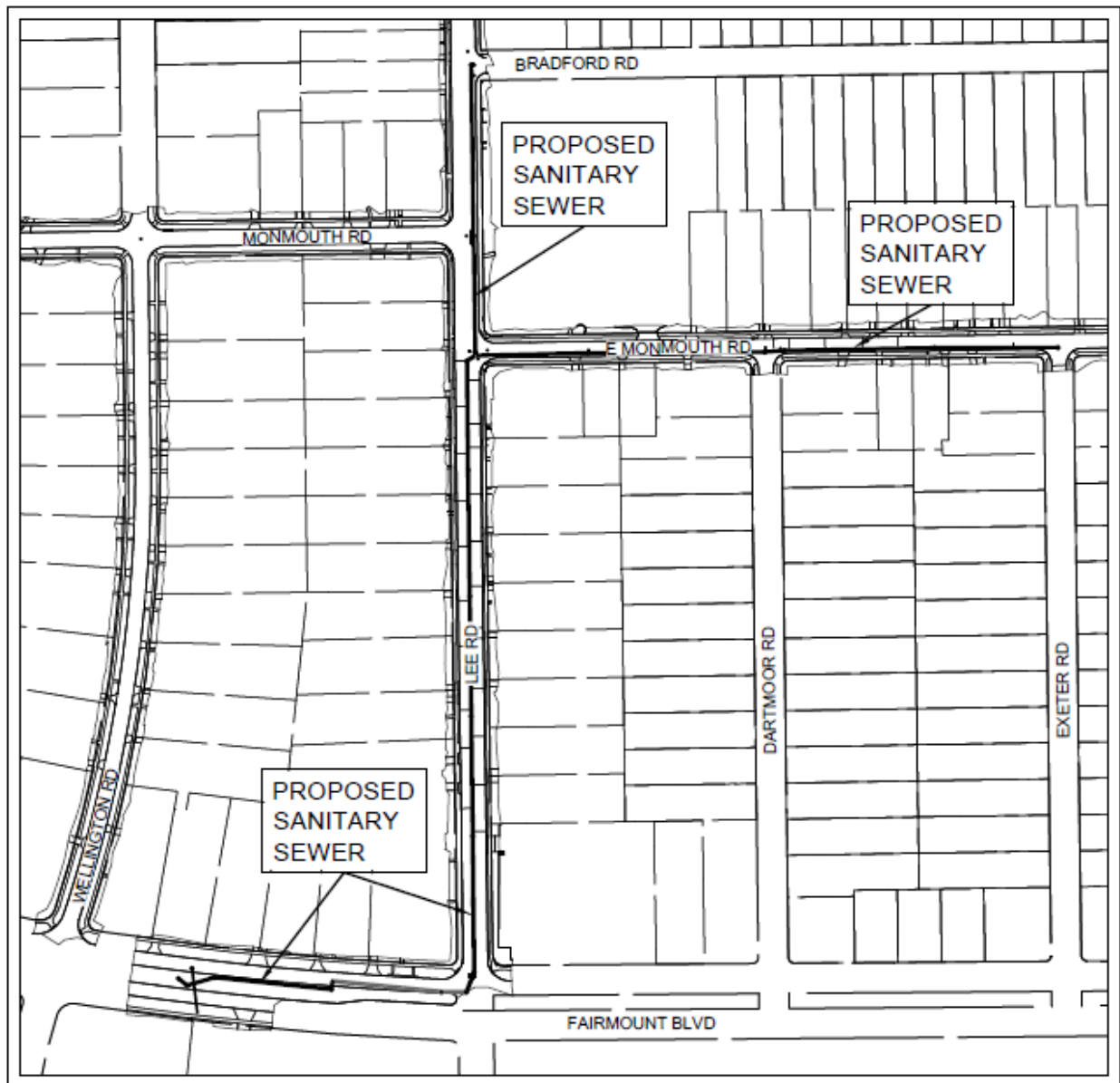


Figure 4. Proposed sanitary sewers