



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

June 1, 2021

Limited Environmental Review and Finding of No Significant Impact

**Village of Tuscarawas – Tuscarawas County
Water System Improvements Project
Loan number: FS390923-0003**

The attached Limited Environmental Review (LER) is for a water infrastructure improvements project in the Village of Tuscarawas which the Ohio Environmental Protection Agency intends to finance through its Water Supply Revolving Loan Account (WSRLA) 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 WSRLA 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,

Jonathan Bernstein

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Water System Improvements

Applicant: Village of Tuscarawas
522 East Cherry Street
Tuscarawas, Ohio 44682

Loan Number: FS390923-0003

Project Summary

The village of Tuscarawas proposes to construct three water system improvements at an estimated total project cost of \$2.24 million using financial assistance from federal and state infrastructure funding sources. Of this amount, the village expects to receive roughly \$1.74 million from sources other than Ohio EPA's Water Supply Revolving Loan Account (WSRLA) program. The WSRLA \$507,000 share of the project costs is expected to be in the form of a 25-year small system 0.16% loan. All of the proposed construction will occur within prior disturbed locations as shown in Figure 1 below.

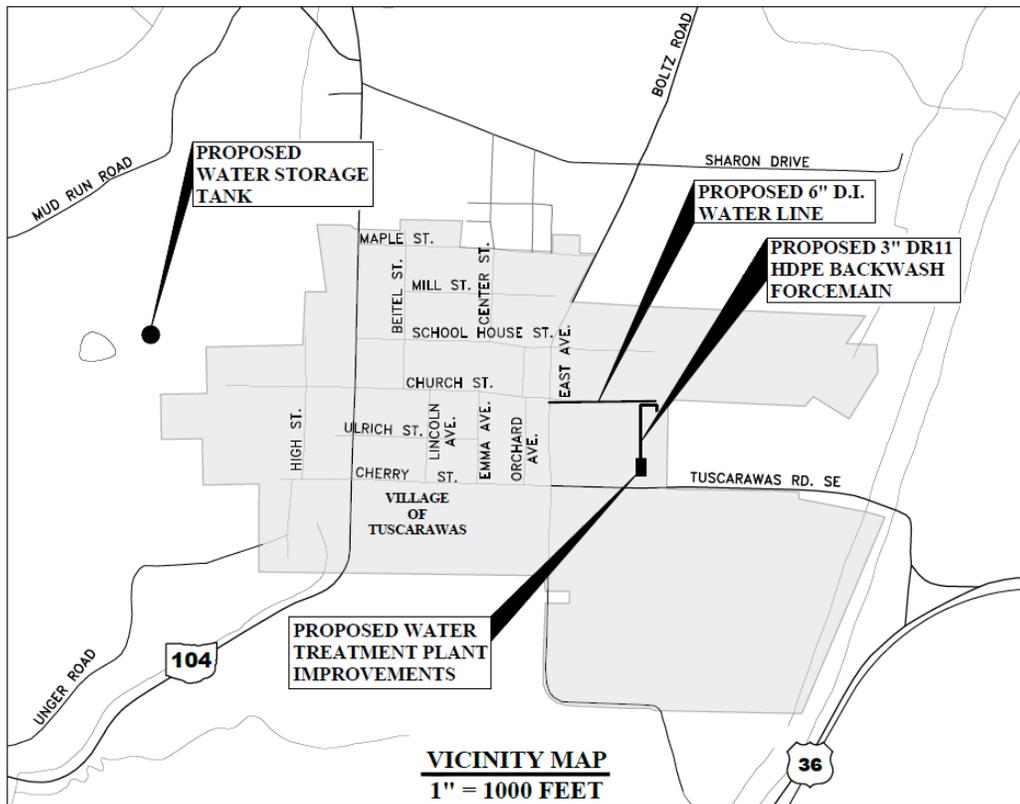


Figure 1. Village of Tuscarawas Water System Improvements Locations

The village expects that the three proposed improvements will correct such problems as inadequate water pressure, stagnant water at specific parts of its distribution system, and excessive amounts of manganese in its finished water supply. To be able to repay its expected project debt over the term of its WSRLA loan, the village passed a three percent increase in its water rates and fees in 2021. In 2022, an average residential water customer of Tuscarawas and the Wainwright subdivision in the county it serves can expect to pay about \$507 for water.

History & Existing Conditions

The village's water treatment plant (WTP) is an iron and manganese sequestration and chlorine disinfection facility and serves about 435 customers in the village and adjacent parts of Tuscarawas County. In 2019, this facility and its distribution system had a rated capacity of 540,000 gallons per day (gpd), an average daily demand of 110,000 gpd, and a peak demand of 146,000 gpd. It draws its raw water from two ground water supply wells developed in 1971. Currently, the village's WTP is not able to remove enough manganese to meet current Safe Drinking Water Act (SDWA) standards. In addition to this facility, the village has a 100,000 gallon below grade water storage tank or reservoir installed circa 1938. This storage tank and the associated equipment in the existing control building are at the end of their useful lives and need to be replaced. The village has one section of water distribution lines that is not properly looped. As a result, the water stagnates and does not properly circulate. There are about seven miles of water distribution mains in the village's system.

Project Description

To address the existing condition of its WTP last upgraded in 2010, the below grade storage tank cleaned in 2016, and a part of its distribution system, the village of Tuscarawas proposes to make three improvements to its water system. These improvements include construction of (1) a new water treatment plant building to hold the proposed vertical pressure filter manganese removal treatment units, a backwash water holding tank with pump and force main, and a new chlorine contact tank, (2) a new 200,000-gallon above-ground water storage tank and related water lines, and (3) a new six-inch diameter water line to properly loop an existing water line along Church Street between East Avenue and Park Drive with sidewalk repair. In addition, magnetic flow meters will be installed at the village's two wells to provide better usage data. All of these improvements will be made at prior disturbed locations. Minor tree removal and site grading is associated with this proposed construction. Figure 2 below shows the location of the proposed improvements.

Implementation

To construct the proposed three-part project described above, the Village of Tuscarawas intends to finance the improvements to its water system through three funding sources: the federal Community Development Block Grant (CDBG) program, the Ohio Public Works Commission (OPWC), and Ohio EPA's WSRLA. Of the total project cost of \$2.24 million, about \$507,000 of WSRLA funding is expected to be used by the village. The \$1.7 million balance will be in the form of a \$750,000 CDBG grant and about \$1 million in OPWC grant (30%) and loan (70%) funds. As a result, only a roughly three percent increase in annual water flat rates and fees is expected to be needed from 2021 through 2022 to repay the village's loans.

Assuming an average residential water customer needs to pay about \$507 annually in 2022, this expected post-project amount is about 0.8% of the village's current median household income of \$60,667.



Photo 3 – 5: Existing water treatment plant site, looking at east side of water treatment plant building



Photo 2 – 4: Water storage tank site, looking southeast



Photo 1 – 7: Water line alignment at intersection of Church Street and East Avenue, looking east

Figure 2. Photos of Existing Water System Infrastructure and Proposed Improvement Sites

On this basis, Ohio EPA expects that the village will save about \$144,445 when compared to a market-rate loan of 2.2% on the project's loan amount of \$507,000 total project. By proposing to fund their project in this way, Ohio EPA anticipates that Tuscarawas should be able to generate enough revenue under its current and proposed rate structure to continue to own, operate, and maintain its water distribution and treatment systems well into the future.

If the village's loan is awarded in June 2021, Ohio EPA expects that the village's contractor will commence construction soon thereafter and complete work in fifteen months. By making these major improvements, including site restoration, Tuscarawas expects to be able to achieve compliance with secondary maximum contaminant levels under the federal Safe Drinking Water Act. In particular, a 200,000-gallon above-grade storage tank at the site of the existing below grade tank will satisfy requirements of average daily flow plus flow for fire protection.

Public Participation

According to the village, the public was provided with opportunities to learn more about this water improvements project and the need for the village's water rate increases in 2021-2022. These activities included two council meetings held in 2019 and two public meetings held on June 11, and June 25, 2020 for the proposed CDBG Residential Public Infrastructure Grant funding. No comments were received from village residents during these two meetings required for CDBG funding.

On this basis, and the limited scope of the project covered by this document, Ohio EPA has determined that no additional public review and comment on the proposed project is necessary. All potentially interested parties appear to have been given adequate opportunity to review and comment on this project and its costs.

Ohio EPA will make a copy of this document available to the public on its web page (<https://epa.ohio.gov/defa/ofa#169638770-wsrla-documents-for-review-and-comment>) and will provide it upon request. A copy may also be posted at the village's offices, other buildings, and on its web site (if available).

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within existing water treatment, storage, and distribution systems, which involves the functional replacement of and improvements to existing mechanical equipment and construction of new ancillary facilities adjacent or appurtenant to existing facilities. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will have no effect on high value environmental resources. Given the proposed project's limited scope, placement within three prior disturbed locations, the absence of any notable above-ground natural features within the immediate project area shown in Figures 1-2, and the village's approach to addressing potential effects, the proposed project will not result in any adverse environmental impacts. This conclusion is validated by the reviews completed by Ohio EPA and federal, state, and other governmental agencies as part of the CDBG review process. Limited site grading and tree removal between October 1 and March 31 are the only aspects of the proposed project that may result in noticeable construction impacts. However, the village has included the needed mitigation in the detail plans to address these potential concerns. There are no floodways, streams, or wetlands in the three project locations shown in Figure 1.

Will not require extensive, specific impact mitigation unique to the assistance proposal. The proposed work to complete this project is generally straight-forward and does not require any extensive mitigation of environmental impacts, as all the water system improvements will be made within previously disturbed areas as shown in Figure 1. In that regard, only routine environmental impact mitigation in the form of a storm water controls, spill control, dust control, vehicle emission and traffic controls, and adherence to prohibited construction activities should be necessary during the estimated fifteen-month construction timeframe. The village expects that any spoil material generated during construction will be taken off-site and disposed of in accordance with all laws and regulations covering this activity so as to protect floodplains and wetlands.

Is cost-effective and not the subject of controversy or significant public interest. In comparison to the no-action options, the village's selected alternatives are more cost-effective on the basis of

costs and non-monetary factors. Moreover, the proposed improvements constituting this project are non-controversial because they will not adversely impact the environment, or the residential rates already being paid or scheduled to increase for village water.

Does not create a new, or relocate an existing discharge to surface or ground waters, and does not create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing water source, or substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters. Given the project's limited scope, this criteria has been met. In particular, Ohio EPA reached the above conclusion because no increase in the village's WTP's rated capacity is needed to serve its residential and other customers over the next 20 years.

Will not provide capacity to serve a population substantially greater than the existing population. Based on information provided by the village during planning, Tuscarawas and its surrounding service area is not expected to grow significantly during the next twenty-five years. The overall annual demand for finished water produced by the village's WTP is indicative of this pattern, when compared to the original design capacity. In addition, the main purpose of this project is to construct improvements adjacent to existing infrastructure without any changes in production capacity or to promote future growth. On this basis, this criterion has been met.

Overall, this proposed project will not change the rated capacity of the village's water infrastructure systems by being designed to match the existing WTP's rated capacity of 540,000 gpd under peak demand conditions. This sizing is consistent with the village's expectation that no or very low population and other growth is expected during the next 20 years. Further, the village's WTP has not operated on average anywhere near its rated capacity in the past decade.

To conclude, the proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. The planning activities for the proposed project identified no potentially significant, direct, indirect, or cumulative adverse impacts. The proposed project is expected to have no short- or long-term adverse impacts on the quality of the human environment or on sensitive resources such as air quality, floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species. The village's proposed water systems improvements project will enable the village to address its regulatory responsibilities under the Safe Drinking Water Act -- especially those related to manganese levels in its raw water supply. As a result, the public health concerns that partly prompted the village to initiate the proposed project are expected to be addressed by its completion.

Contact information

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