



July 31, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Canton – Stark County
11th Street SE Improvement
Loan number: CS390224-0038**

The attached Limited Environmental Review (LER) is for a sanitary sewer project in Canton 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 blue ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: 11th Street SE Improvement

Applicant: City of Canton
218 Cleveland Avenue SW
Canton, Ohio 44702

Loan Number: CS390224-0038



Figure 1. Stark County

Project Summary

The City of Canton, in Stark County (Figure 1), has requested \$2.79 million from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the 11th Street SE Improvement project. This project involves the replacement of high-risk sanitary sewers that have exceeded their expected useful life. Canton intends to improve system reliability and operational efficiency through completion of this project. Additional work consists of the replacement of sections of storm sewer and water main, realignment and reconstruction of 11th Street SE, and various streetscape elements.

History & Existing Conditions

Canton's water reclamation facility (WRF), located at 3530 Central Avenue SE, is a tertiary treatment facility that provides wastewater treatment for 220,000 people in the Nimishillen Creek basin (parts of Stark County and North Canton). The WRF is designed for an average flow of 39 million gallons per day (mgd) and a peak flow of 88 mgd; however, the current average daily flow to the WRF is roughly 27 mgd. The WRF's wet stream consists of raw wastewater, grit and grease removal, mechanical fine screening, flow equalization, membrane bioreactors, and post aeration. Solids handling consists of aerated sludge holding, dewatering by centrifuges, and disposal at the local landfill. Treated effluent is discharged to Nimishillen Creek in accordance with the conditions specified in Canton's National Pollutant Discharge Elimination System (NPDES) permit.

Canton currently has several ongoing and planned projects intended to improve sanitary sewer infrastructure within their wastewater system, including the 11th Street SE Improvement project. This project is a joint roadway, sanitary, storm, and water project that involves the realignment and reconstruction of 11th Street SE, from Cleveland Avenue SW to Madison Avenue SE, and the installation of a roundabout at the intersection of 11th Street SE and Market Avenue S. The existing sanitary sewers in this area are over 100-year-old vitrified clay pipe that are beyond their useful life expectancy. A field survey and investigation of the sewers identified damaged sections of pipe and manholes in need of replacement. These damaged sections of pipe and manholes allow stormwater, referred to as infiltration, to enter the sewer system, increasing the amount of stormwater reaching the WRF and reducing available treatment capacity.¹ Furthermore, segments of sewers in the area

¹ Infiltration/Inflow (I/I) is defined as extraneous, clear water that enters a sanitary sewer system through surface or subsurface locations. Infiltration usually occurs when clear water enters the system below ground through cracked or broken pipes and manholes, poorly sealed or misaligned pipe joints, damaged or poorly connected sewer laterals, etc. Inflow may include clear water entering the system through manhole covers, roof or foundation drains, direct storm sewer connections, etc.

are under and near existing buildings and railroads. Due to age, condition, and location, Canton has identified sanitary sewers in the project area as high-risk and in need of replacement to ensure system reliability, reduce risk of failure, and align the sewers with the new roadway route.

Project Description

Canton intends to replace sanitary sewers along 11th Street SE with 2,571 linear feet of new 30-inch diameter sanitary sewer, manholes, laterals, and associated appurtenances. Additionally, the project includes 71 linear feet of 21-inch, 1,223 linear feet of 12-inch, and 1,091 linear feet of 8-inch smaller diameter sewers to connect side streets (Figure 2). New sanitary sewers will be installed following the new alignment of 11th Street SE. In doing so, the structural integrity of part of Canton's sanitary sewer system will improve. Furthermore, the revised sanitary sewer routing will eliminate high-risk crossings of sewers under and near existing buildings and railroads. These sewers will connect and convey wastewater flow to new sewers being built as part of Canton's associated sewer project, the Allen Avenue project.

As previously mentioned, the project also includes the replacement of sections of storm sewer and water main in the project area, as well as realignment and reconstruction of 11th Street SE. Disturbed surfaces will be restored and landscaped following completion of the other construction activities.

Implementation

Canton proposes to borrow \$2.79 million from the Ohio WPCLF at the standard rate of 2.62 percent (interest rates are set monthly and may change for the requested August loan award) to cover sanitary sewer construction costs for the project. Borrowing the amount in WPCLF monies could save Canton roughly \$431,000 over the 20-year loan term compared to the current market rate of 3.87 percent. Canton also expects to receive \$7.18 million in federal grant funding for use towards costs not associated with utility work.

The debt associated with this project will be recovered from monthly sewer charges. Sewer charges for Canton residents are driven by the total indebtedness of Canton and annual operation and maintenance costs as opposed to the specific indebtedness of any one particular project. Canton reviews sewer rates annually. The most recent rate increase took effect April 2023, resulting in a monthly increase of approximately \$3.71 for the average Canton resident. The annual average sewer bill for a resident served by Canton is \$237. This represents 0.72 percent of the median household income for Canton (MHI; \$32,735) and compares favorably to the Ohio average annual sewer bill of \$749.

Construction is expected to begin following loan award and take 18 months to complete.

Public Participation

Canton has presented information on the project at public city council meetings at which residents are allowed to voice concerns and opinions. Canton holds multiple city council meetings each month and provides information on the time, location, and agenda for the meetings on the city website, as well as records of meeting minutes. Some of the city council meetings are streamed live on Canton's YouTube channel. Also provided on Canton's website is information on ongoing and planned projects: <https://www.cantonohio.gov/567/City-Projects>. Local news articles have covered this project as well.

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>.

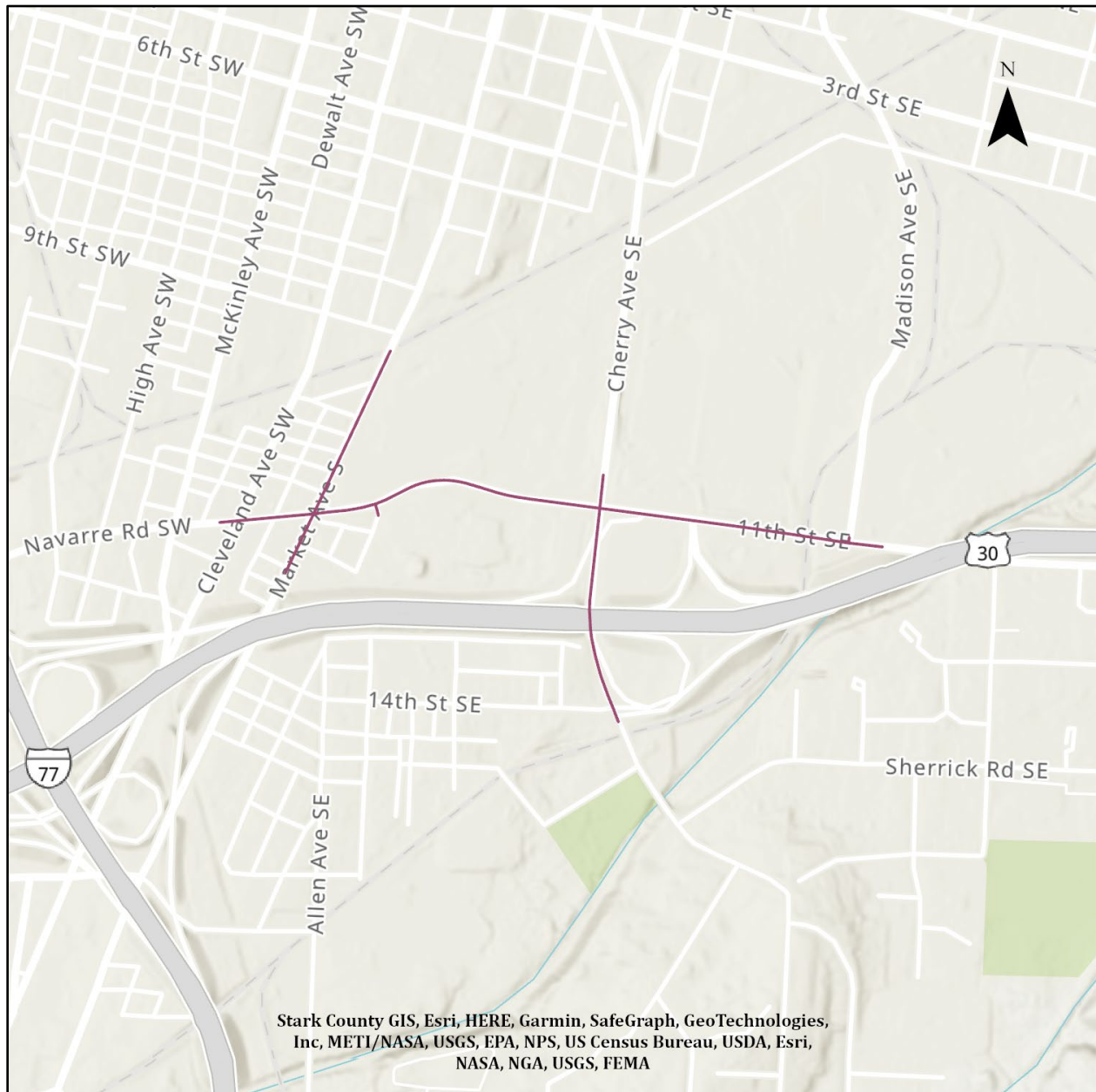


Figure 2. City of Canton project location map. Construction will occur along 11th Street SE, as well as Market Avenue S, Cherry Avenue SE, Madison Avenue SE, and other nearby side streets.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater system, which involves the replacement of existing

sanitary sewers. 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. Sanitary sewer work for the project will take place in developed, urban Canton where there are no sensitive, unique, or otherwise valuable environmental resources. It will be the contractor's responsibility to implement applicable construction best management practices to limit erosion, sediment, noise, dust, traffic disruptions, and like factors for the duration of the project. Due to the nature and location of the proposed project, no significant short-term or long-term adverse impacts are expected.

Is cost effective. Although methods of sanitary sewer rehabilitation exist, such as cured-in-place pipe lining, no alternative other than the proposed replacement of sanitary sewers corrects damaged, failing sections of sewer, eliminates high-risk crossings of sewers under and near existing buildings and railroads, and establishes routing of sewers to match the new alignment for 11th Street SE.

Is not a controversial action. The nature of the project is such that there will be no adverse impacts to residents or the environment, and no significant opposition to the project has been reported. Canton has reduced the overall cost of the project by completing all roadway, sanitary, storm, and water work as a single project rather than separate and have reduced the debt service for this project by pursuing a below-market interest rate loan through the Ohio WPCLF and sources of federal grant funding.

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. This project merely involves the replacement of existing sanitary sewers and will not otherwise affect Canton's public wastewater system (e.g., collection, conveyance, treatment, discharge, etc.).

To conclude, Canton's proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. Based on Ohio EPA's review of the planning information and the materials presented in this LER, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to the quality of the human environment and on sensitive environmental resources (e.g., surface waters, coastal zones, floodplains, wetlands, state-designated scenic and recreational rivers, prime and unique agricultural lands, aquifer recharge zones, archaeological and historically significant resources, threatened and endangered species, and state and federal wildlife areas. Rather, completion of Canton's proposed project will enable the city to continue to address and correct deficiencies within their wastewater system.

Contact Information

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