



September 19, 2025

**Preliminary Finding of No Significant Impact
To All Interested Citizens, Organizations, and Government Agencies**

**City of Lakewood – Cuyahoga County
CSO-052 Storage Facility
Loan Number: CS390503-0023**

The attached Environmental Assessment (EA) is for a wastewater storage and conveyance project in Lakewood 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 EA describes the project, its costs, and expected environmental benefits. We would appreciate receiving any comments you may have on the project. Making available this EA and seeking your comments 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 program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. More information can be obtained by contacting the person named at the end of the attached EA.

Any comments on our preliminary determination should be sent to the email address of the contact named at the end of the EA. We will not act on this project for 30 calendar days from the date of this notice. In the absence of substantive comments during this period, our preliminary decision will become final. After that, the City of Lakewood can then proceed with its application for the WPCLF loan.

Sincerely,

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

Kathleen Courtright, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

Project Identification

Project: CSO-052 Storage Facility

Applicant: City of Lakewood
12650 Detroit Avenue
Lakewood, Ohio 44107

Loan Number: CS390503-0023

Project Summary

The City of Lakewood has requested financial assistance from the Ohio Water Pollution Control Loan Fund (WPCLF) for the CSO-052 Storage Facility project. Work for this wastewater conveyance and storage project will include the construction of 6.1-million-gallon wastewater storage facility to intercept wastewater flows and to address Lakewood's consent decree with U.S. EPA to reduce combined sewer overflows to Rocky River. The total estimated loan amount for the project is \$35,395,925, with debt for the project being repaid from monthly service charges. Lakewood expects to receive additional funding for the project through a Congressionally Directed Spending grant and through a loan from the Ohio Public Works Commission. The project is scheduled to begin construction in winter 2025 and be completed in 30 months.

History & Existing Conditions

The City of Lakewood, in Cuyahoga County, owns and operates a wastewater collection and treatment system which serves a population of over 50,000 people. Lakewood's wastewater treatment plant (WWTP) is an activated sludge-based plant currently designed for an average daily flow of 18 million gallons per day (MGD) dry weather flow and sustained peak primary and secondary treatment capacity for wet-weather flows of 30 MGD. Lakewood's secondary treatment system can handle flows of up to 40 MGD for limited periods. The WWTP discharges treated effluent to the Rocky River.

Lakewood's sewer collection system is comprised of approximately 75% separated sanitary sewers and 25% combined sewers (pipes that in dry weather carry sanitary sewage only, and during wet weather carry sanitary flows combined with storm drainage). During heavy rain, these combined sewers can become inundated, resulting in combined sewer overflows (CSOs) discharging to surface water. CSOs have taken place in Lakewood since the early 1910s and worsened as Lakewood continued to be developed in the 1940s, increasing the impervious area.

One of Lakewood's CSOs, CSO-052, has activated 343 times over the last five years, discharging 384.15 million gallons of untreated combined sewage and stormwater directly into the Rocky River. Lakewood's CSO-052 sewershed area, which is served by combined sewers, is 588 acres in size with

approximately 5,799 households, 13,976 residents, and 192 commercial properties. CSO-052 is the largest yearly discharger of untreated combined sewage in the Lakewood collection system.

The City of Lakewood entered into a consent decree with the U.S. EPA which formalizes elements for the city's Integrated Wet Weather Improvement Plan (IWWIP). As part of Lakewood's IWWIP, and included in the consent decree, Lakewood is required to construct a 6.1-million-gallon (MG) storage facility to intercept combined sewer flows before they reach the Rocky River. The storage facility will help Lakewood address its consent decree to reduce overflows at CSO-052 to four or less per year, improving and protecting the sensitive habitat of the Rocky River.

Population and Flow Projections

There are no other planned related projects in the CSO-052 sewershed area. Lakewood and the CSO-052 sewershed area is fully developed with a population expected to be nearly the same over the 20-year planning period. No development projects are currently planned for the sewershed area. Lakewood's WWTP capacity is sufficient for wastewater flows in city's service areas.

Alternatives

The alternatives for CSO-052 were developed with review, oversight, and meetings with Ohio EPA, U.S. EPA, and the Department of Justice (DOJ) throughout 2013 to 2022, and through Lakewood's submittal of IWWIP reports. The alternatives considered the level of control, nature of control, and the technology whereby the control would be achieved. The level of control considered a range of outcomes from four to zero discharges per typical year, as well as controlling discharges in two-, five-, and 10-year storm events. Nature of control considered activation frequency reduction, volume reduction, total pollutant reduction, and sewage pollutant reduction. The technologies considered included end-of-pipe discharge alternatives, public system separation, public and private separation or source control, and various types of wastewater storage for subsequent treatment at the WWTP. Based on the city's consent decree, the Ohio EPA, US EPA, and DOJ agreed that the 6.1-MG CSO-052 storage facility is the preferred alternative as it provides the best control and treatment at a reasonable cost. Additionally, this alternative is the least disruptive to the public, community, and businesses.

The wastewater storage basin alternative includes the installation of a wastewater conveyance sewer crossing of the Rocky River. Lakewood investigated alternative stream crossings of the Rocky River, which included a conveyance sewer line installed under the river and a conveyance sewer line suspended above the river. The conveyance sewer constructed under the river included a temporary construction drive created across the river, coffer dams, a series of culverts to convey the water downstream, and open-cut installation of the sewer line. Once completed, the under-river installation would be restored to pre-construction conditions.

The suspended sewer line alternative included either a permanent in-stream pier to support the sewer line, or a fully suspended sewer line structure. The in-stream pier option included a temporary construction drive created across the river, coffer dams, and a series of culverts to convey water downstream. This action would include construction of a pier footer installed into the stream bed, creating a permanent in-river obstruction and long-term maintenance requirements related to the

footer and pier. The fully suspended sewer line option would require substantially more land on both sides of the river to construct a sewer line that is fully suspended. These land requirements would entail additional tree clearing and wetland impacts on the east side of river, and additional land needed for construction of the wastewater storage basin on the west side of the river. Due to the permanent environmental impacts of the suspended conveyance sewer, and as it was projected to be approximately double the expense on the under-stream construction, the suspended conveyance sewer was eliminated from consideration.

As part of the selected alternative, the building that currently houses the Lakewood Animal Shelter will be demolished to provide space for construction of the wastewater storage basin. The animal shelter is being relocated to new facility adjacent to the city's Refuse and Recycling Center.

Selected Alternative

The CSO-052 Storage Facility project (see figures 1 and 2) is designed to provide storage for wastewater flows within the sewershed to address Lakewood's consent decree for a reduction of CSO events at CSO-052 to four or less per year. The project will intercept wastewater currently flowing to CSO-052 and convey it to a new storage basin at the Lakewood WWTP. Following storm events, wastewater accumulated in the storage basin will be directed to the WWTP for treatment. Specifically, the project consists of the following:

- Construction of a round, prestressed concrete, partially buried, 6.1-MG storage basin
- Installation of a passive control regulator on the existing outfall pipe to regulate flows that are conveyed to the basin
- Installation of a 54-inch-diameter conveyance sewer under the Rocky River riverbed to the basin site
- Construction of a dewatering pump station with three submersible pumps discharging to the headworks of the treatment plant
- Installation of a new sewer to redirect flows to the drop shaft
- Installation of approximately 511 linear feet (LF) of 36- and 54-inch diameter gravity sewer
- Installation of approximately 520 LF of 18-inch diameter force main sewer
- Restoration activities

Implementation

The total estimated cost for the proposed project is \$41,223,886. Lakewood will be receiving a Congressionally Directed Spending grant in the amount of \$959,752, as well as a \$4,336,265 loan from the Ohio Public Works Commission for this project, leaving a balance of \$35,395,925. Lakewood plans to borrow this amount from the WPCLF and qualifies for the standard below-market interest rate, which for September is 3.83% over 30 years. Borrowing \$35,395,925 at 3.83% will save Lakewood approximately \$9,900,000 over the 30-year loan period compared to borrowing the same amount at the current market rate of 5.13%. WPCLF interest rates are set monthly and may change for a later loan award.

Under proposed sewer rates for the project area and based on usage of 4,000 gallons of water per month, the average residential sewer bill will be \$56.79 per month, or \$681 per year, as compared to the state average of \$528.

Public Participation

Ohio EPA is unaware of any controversy about or opposition to this project. Lakewood has had multiple city council meetings that were open to the public and has a dedicated website with information on all consent decree projects. This Environmental Assessment (EA) and preliminary Finding of No Significant Impact (FNSI) will be posted on the Ohio EPA Division of Environmental and Financial Assistance website. Additionally, the EA and FNSI have been provided to the City of Lakewood to be made available according to their public notification procedures.

Environmental Impacts

The project has the potential to affect the following features, but the effects will be reduced or mitigated to acceptable levels as explained below.

Air Quality, Dust, Noise, and Odors: During construction, dust and vehicle exhaust will be insignificant sources of local air pollution. Dust due to excavation in dry weather will be controlled by good housekeeping measures (minimizing the area of disturbed soil, road sweeping, dust suppression with water or other benign dust suppressant). Operation of the EQ structure and lift station may contribute minimal additional pollution to the project area. However, this addition is expected to be negligible compared to ambient conditions in the area of the existing wastewater treatment plant.

Lakewood had a National Emission Standard for Hazardous Air Pollutants (NESHAP) asbestos survey performed of the Lakewood Animal Shelter building, located at 1299 Valley Parkway, which is the site of the proposed wastewater storage basin. This survey was performed to comply with the NESHAP renovation/demolition inspection requirements related to the building. Asbestos-Containing Material (ACM) and Regulated Asbestos-Containing Material (RACM) were identified during the survey. Notification of Intent to Renovate/Demolish is required to be submitted to U.S. EPA, and notification is required to be made to Ohio EPA prior to actions affecting ACM and RACM. Lakewood or its contractors will submit these notifications prior to beginning any asbestos abatement and/or demolition project.

Based on this information, and the construction restrictions in place, the project is not expected to have significant short-term or long-term adverse effects on air quality, dust, noise, and odors.

Aquatic Habitat and Surface Water Resources: Sediment and erosion controls will be used during construction to minimize run-off from construction-related activities. Construction areas disturbed by the project in the Rocky River will be stabilized and restored after construction.

The majority of the proposed project will not have significant adverse long-term impacts on surface water resources as work will primarily be within and adjacent to an active WWTP with extensive prior excavation, in which the predominant cover is pavement, gravel, sidewalks, or lawn. U.S. Army Corps of Engineers issued Lakewood a Nationwide Permit for temporary effects that are expected to take

place on a small wetland at the proposed regulator location on the east side of the river, and for in-water work within the Rocky River for installation of the conveyance sewer. Other minor, short-term impacts from the open-cut construction could occur. Excavation of the regulator, conveyance sewer, lift station, and wastewater storage basin could lead to erosion and deposition that will be minimized as outlined in the project's Stormwater Pollution Prevention Plan (SWPPP).

Based on this information, and the construction restrictions in place, the project is not expected to have significant short-term or long-term adverse effect on aquatic habitat and surface water resources.

Archaeological and Historical Resources: Based on extensive pre-design review and coordination with the Ohio State Historic Preservation Office, Ohio EPA concluded that the proposed undertaking will have no effect on historic properties, and that no features listed, or eligible for listing, on the National Register of Historic Places will be adversely impacted by the proposed project.

Based on this information, Ohio EPA believes that, due to the extent of disturbance in the project area, unrecorded archaeological sites, or properties eligible for or listed on the National Register of Historic Places, are not likely to be present.

In the event that archaeological properties are found during construction, contractors and subcontractors are required under Ohio Revised Code Section 149.53 to notify the Ohio State Historic Preservation Office and Ohio EPA and to cooperate with those entities in archaeological and historic surveys and salvage efforts when appropriate.

Terrestrial Habitat and Endangered Species: Ohio EPA coordinated with the U.S. Fish and Wildlife Service (USFWS) and Ohio Department of Natural Resources (ODNR) regarding potential species impacts.

The project is within the range of the federally endangered Indiana bat and northern long-eared bat, and state endangered little brown bat and tricolored bat. Trees within the project area are a mixture of large- and medium-sized trees and scrubby brush. Other mature trees are located outside of the work area and would provide alternative habitat. Tree removal will only be permitted October 1 to March 31 or in coordination with USFWS/ODNR, and tree removal is limited to only those trees necessary for completion of the project (e.g., trees within the excavation location or within the path of heavy equipment, etc.). These tree clearing restrictions will ensure that any potential impacts to these bat species are avoided.

The project is within the range of the lake sturgeon, a state endangered fish and federal species of concern; and the channel darter and bigmouth shiner, both state threatened fish. Due to the project area including in-stream actions, work in this habitat should only occur from July 1 to September 14. These construction restrictions will further ensure that any potential impacts to this species will be avoided.

The project is within the range of the rufa red knot, a federally threatened bird; the monarch butterfly, a federal candidate species; the smooth greensnake, a state endangered species; the spotted turtle and Blanding's turtle, both state threatened species; and the deer's-tongue arrowhead, a state

potentially threatened plant. However, due to the lack of appropriate habitat present, these species are not likely to be impacted.

Coordination included a mussel survey of the Rocky River project area. ODNR indicated that no mussel relocation was required.

Based on this information, and the construction restrictions in place, the project is not expected to have significant short-term or long-term adverse effect on terrestrial habitat or endangered species.

Floodplains: A portion of the project site falls within the designated zone of the regulatory floodway and the 100-year floodplain of the Rocky River. Work in this area will be temporary, and final structures will be below grade. All other project work, including the wastewater storage basin, will be above the 25- and 100-year floodplains. Lakewood has coordinated reviews of this project with the local floodplain administrator to ensure compliance with all local floodplain regulations. There are no short-term or long-term significant adverse impacts to the floodplain anticipated as a result of the proposed project.

Based on the above, the proposed project is not expected to result in significant adverse long-term impacts to floodplains.

Groundwater Resources: A Phase II Environmental Site Assessment was performed at the site of the Lakewood Animal Shelter, which is the site of the proposed wastewater storage basin. This Phase II investigation took place to identify contaminated soil and/or groundwater that would be encountered during demolition activities of the animal shelter and during excavation of the wastewater storage basin. Contaminated soil and groundwater were identified during this investigation. A Groundwater Management Plan will be developed prior to demolition and excavation activities. Soil and groundwater excavated will be sampled, characterized, and managed per the applicable environmental regulations.

Dewatering of groundwater to enable below grade work may be necessary, but engineering controls are part of the specifications to minimize these effects.

Based on the above, the proposed project is not expected to result in significant adverse long-term impacts to groundwater resources.

Safety and Traffic: Construction in road rights-of-way will cause temporary traffic disruption and potential threats to public safety. Contract documents require contractors to implement standard traffic controls to minimize traffic disruption and public safety risks. For example, contractors are required to cover or close trenches overnight, maintain access for emergency vehicles at all times, and utilize traffic direction devices such as flaggers, coves, and barricades. With these precautions, the project is unlikely to create significant traffic disturbance or threats to public safety. The project will not permanently alter traffic patterns. Therefore, the project will have no long-term change or adverse impacts on safety and traffic.

Based on the above, the proposed project is not expected to result in significant adverse long-term impacts on safety or traffic.

Unaffected Resources: The following resources are not present and therefore will not be impacted by this project: farmland, coastal zones, wild and scenic rivers, sole source aquifers, and source water assessment and protection areas. Additionally, there will be no change in current energy use or land use as it pertains to public space, nor will there be any impacts to drinking water.

Conclusion

Based upon Ohio EPA's review of the planning information and the materials presented in this Environmental Assessment, 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 will allow Lakewood to address its consent decree with U.S. EPA to reduce combined sewer overflows to Rocky River, reducing environmental and public health threats related to exposure to untreated wastewater. Also, by using WPCLF low-interest financing, Lakewood has minimized the project cost.

Contact information

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Figure 1. General project area

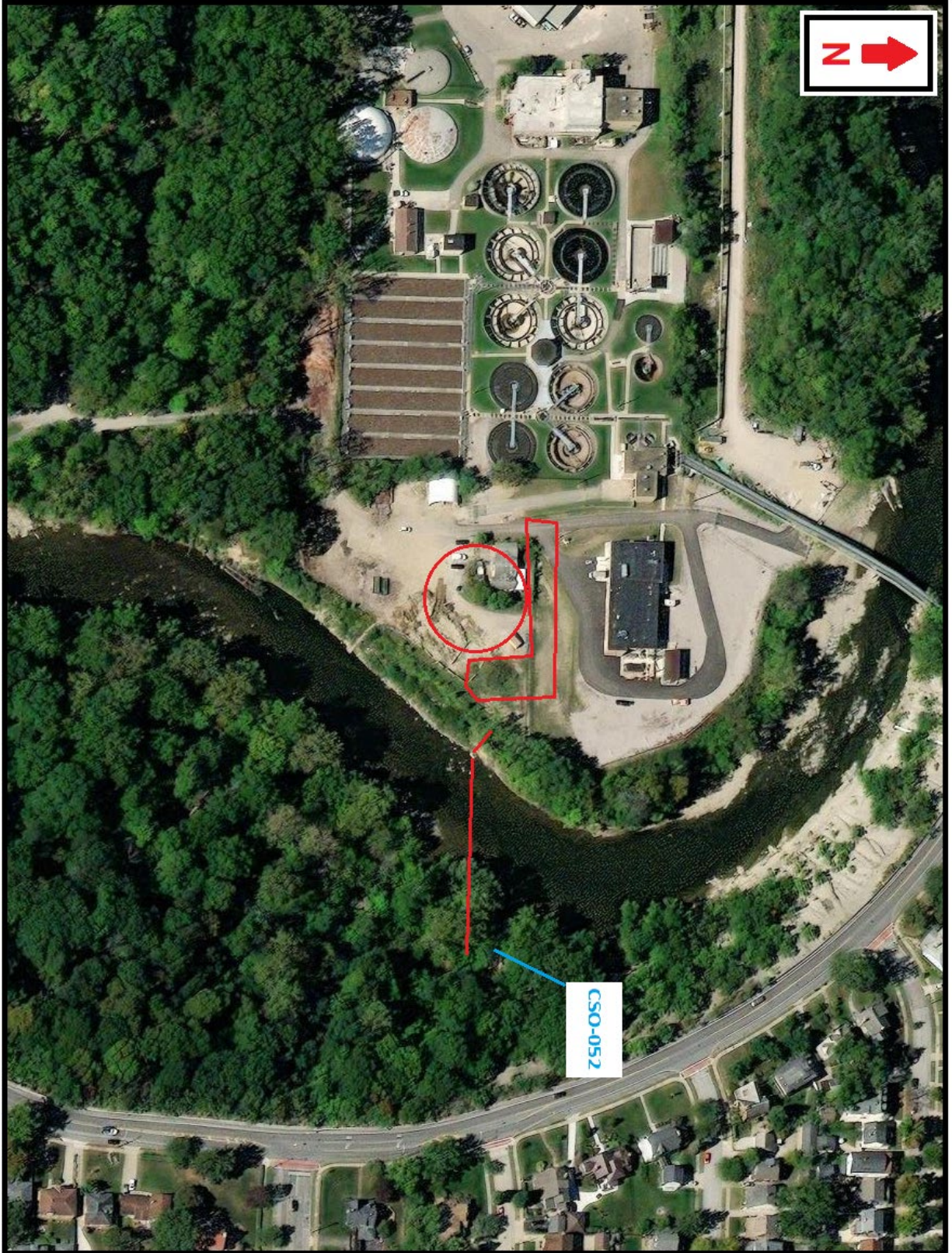


Figure 2. Project area