



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

April 29, 2021

**Limited Environmental Review and Finding of No Significant Impact**

**City of Kent – Portage County  
Southwest Sanitary Sewer Pump Station Replacement  
Loan number: CS390486-0015**

The attached Limited Environmental Review (LER) is for a pump station replacements project in Kent 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,

*Jonathan Bernstein*

Jonathan Bernstein, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Project: Southwest Sanitary Sewer Pump Station Replacement

Applicant: City of Kent  
301 South Depeyster Street  
Kent, Ohio 44240

Loan Number: CS390486-0015

### **Project Summary**

The City of Kent has requested \$2,000,000 from the Water Pollution Control Loan Fund (WPCLF) to replace two aging pump stations and gravity sewer lines between them. All work will be within the city street, residential right-of-way, and park tree-lawn, and will affect no important environmental features. Environmental impacts will be minimal as this project involves construction within developed areas.

### **History & Existing Conditions**

The City of Kent is located in Portage County (See Figures 1 and 2 for orientation) along the Cuyahoga River. The city-owned water reclamation facility is located on the southwest side of Kent, and discharges treated wastewater to the Cuyahoga River. The City also owns and operates two pump stations built in the 1960s in the southwest area of the city, on Middlebury Road and Yacavona Drive. The Middlebury pump station is rated to pump 200 gallons per minute (gpm) of wastewater, and the Yacavona pump station is rated to pump 100 gpm. The Middlebury pump station serves 141 homes and has a peak flow of 130 gpm. The Yacavona pump station serves 58 homes and has a peak flow of 54 gpm.

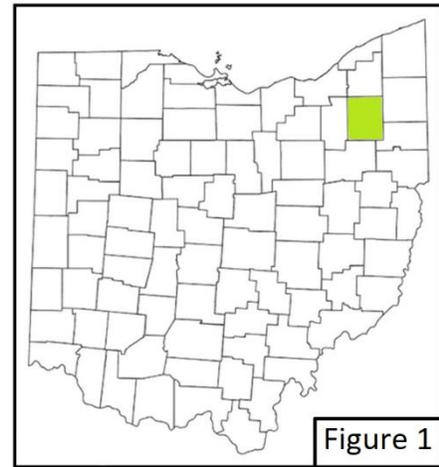
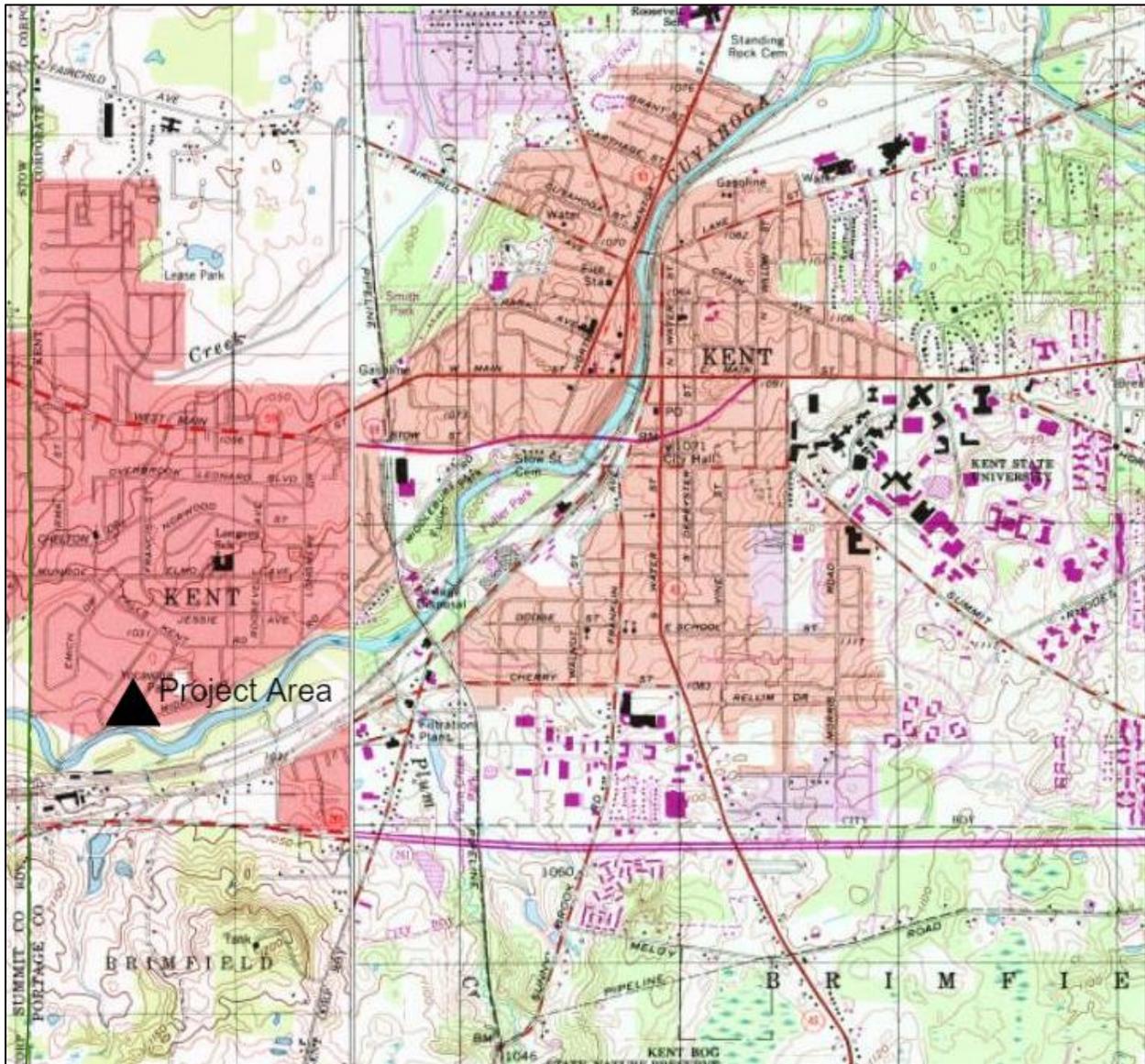


Figure 1

Both pumping stations are well beyond their expected useful life. They are both badly deteriorated, require constant repair and are difficult to maintain in light of modern confined space requirements and limited availability of spare parts. They both have limited and difficult accessibility due to their below-grade designs. Neither station appears to meet current electrical or NFPA code requirements for electrical devices in classified areas.

A feasibility study was performed in 2015 to evaluate alternatives to address the failing pump stations: replacing both pump stations or combining the two pump stations with one replacement. The alternative of combining the two pump stations with one replacement had a slightly higher lifecycle cost but had other non-monetary factors that made this the better option than replacing both pump stations. This option would abandon the Yacavona pump station and construct gravity

sewer to collect wastewater from the homes between the two existing pump station and would convey flow to the Middlebury pump station. The Middlebury pump station is located downhill from the Yacavona pump station, so was chosen as the pump station to be replaced. Replacing two pump stations with one will result in lower pumping costs, is easier to operate and maintain, requires less staffing, and less electricity consumption.



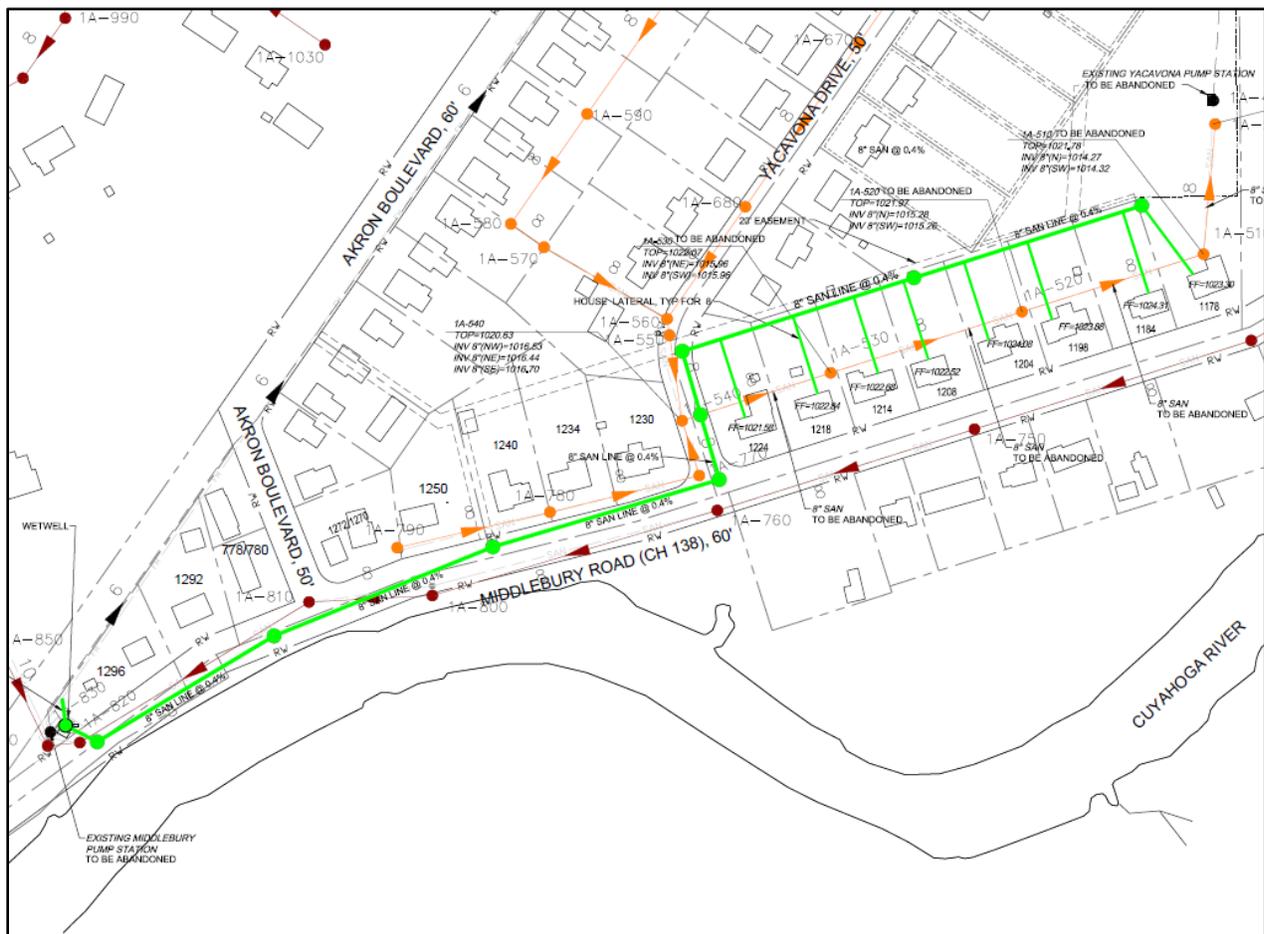
**Figure 2. Map of Kent with the project area marked with black triangle**

**Project Description**

The project consists of constructing a new sanitary pump station, replacing the existing Middlebury Road pump station. The new pump station will be designed to pump 300 gallons per minute. To

connect existing force main to the new Middlebury pump station 25 feet of 6-inch force main sewer will be installed. The revised gravity sewer alignment replaces 2,010 feet of 8-inch gravity sewer, 20 feet of 10-inch sanitary sewer, and lateral replacements will be installed along Middlebury Road and in the easements behind eight homes on Middlebury Road (See Figure 3). Manholes, valves, and other appurtenances along this alignment will be replaced. A new driveway to the Middlebury Road pump station will be installed, and the street repaved along the Middlebury Road alignment after the sewer is replaced. Middlebury Road will be closed for 60 days during construction, with a maintenance of traffic plan in place. The Yacavona Drive pump station will be abandoned, which involves properly disposing of untreated sewage, removing the structure four feet below the ground surface, punching holes in the bottom of the wet well for drainage, and filling the structure. Part of Yacavona Park will be closed during the decommissioning of the Yacavona pump station (See Figure 4). A traffic maintenance plan will be in place during the 60-day closure of Middlebury road for construction.

Decommissioning the Yacavona pump station and relocating the gravity sewer replacement from Middlebury Road to the back yards of these residences puts the sewer replacement farther away from the Cuyahoga River. This option would have lower construction, dewatering, and restoration costs than constructing a deeper gravity sewer along Middlebury Road.



**Figure 3. Map of project area, with sewer replacement alignment marked in green and pump station locations labeled**



**Figure 4. Map of Yacavona Park and the location of the pump station in the park’s tree-lawn**

**Implementation**

Kent will borrow approximately \$2,000,000 from the WPCLF. The City qualifies for a 0.43% standard interest rate. During the 30-year loan period, Kent will save approximately \$ by using WPCLF dollars at this rate, compared to the market rate of 2.04%.

*Local Economy*

A typical residential customer living in Kent is currently paying \$410 annually for sewer service. The previous sewer rate increase was 3% in January 2020, and the City plans to increase sewer rates 3% every subsequent year. According to the 2013-2017 American Community Survey, the estimated median household income (MHI) in Kent is \$36,411. The average annual sewer cost in 2021 after rate increases will be \$422 per year, which is 1.16% of the MHI and is generally considered affordable. Assuming project loan award in June 2021, construction will begin, and be complete by early 2022.

**Public Participation**

The City of Kent held a public meeting April 30, 2019. All impacted residents, and residents abutting the project were sent letters inviting them to the public meeting. The City reached out to residents

that were not at the public meeting to discuss the project and the impact to their specific properties. Temporary easements were negotiated from the residents in November 2019. Earlier this year it was determined that permanent easements were needed from several residents, and the permanent easements were negotiated behind these properties.

Letters will be sent to affected residents to alert them of the bidding process and expected construction dates.

The contractor is responsible for coordinating with residents as they cross their property and ensuring residents have uninterrupted utility service and access to their properties. The City will also have an inspector onsite during construction and will be available to answer questions.

Residents were made aware of City Council's approval of the sewer rate increase in January 2020 through public meetings and regular posting of the legislation. Ohio EPA is unaware of controversy about or opposition to the project. Ohio EPA will make a copy of this document available to the public on its web page <https://epa.ohio.gov/defa/ofa#169638769-wpclf-documents-for-review-and-comment> and will provide it on request.

### **Conclusion**

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

**Will have no significant environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources** because the project is replacing an existing pump station and sewer pipes along roads and residential tree-lawn where no habitat of ecological importance will be affected. Some trees will need to be cut for this project. The entire state of Ohio is habitat for the endangered Indiana bat and threatened northern long-eared bat. To avoid affecting bat habitat, all trees will be cut between October 1 and March 31. Trees that are not in the direct project alignment will be protected as required by the City. A stormwater pollution protection plan will be in place during the project. Silt fencing will be installed around the project excavations, and silt/sediment from excavations dewatering will not be allowed to be discharged to the nearby Cuyahoga River before proper filtration and settling.

**Is cost-effective and not a controversial action** because the City of Kent selected the most efficient alternative to address failing pump stations by eliminating the small Yacavona pump station and upsizing the Middlebury Road pump station. Additionally, the existing sewer draining to the Yacavona pump station will be re-routed to carry flows to the Middlebury Road pump station, and the cost-effective alignment is located in the easements behind the homes along Middlebury Road.

Ohio EPA is unaware of any 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** because this project will not create

a new discharge or change loading of pollutants to receiving waters. This project is a replacement of existing facilities and piping.

**Will not provide capacity to serve a population substantially greater than the existing population** because this project will not install any new sanitary connections, it will only be replacing existing equipment and sewer laterals.

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 waters, coastal zones, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, threatened or endangered species, or state and federal wildlife areas) because these resources are not present in the project area.

### **Contact information**

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