



August 8, 2025

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

**City of Elyria – Lorain County
Lowell Street SS Extension
Loan Number: CS390337-0039**

The attached Environmental Assessment (EA) is for a sanitary sewer extension project in Elyria 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 Elyria can then proceed with its application for the WPCLF loan.

Sincerely,

Jonathan Bernstein for

Kathleen Courtright, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

Project Identification

Project: Lowell Street Sanitary Sewer Extension

Applicant: City of Elyria
131 Court Street
Elyria, Ohio 44035

Loan Number: CS390337-0039

Project Summary

The City of Elyria in Lorain County (Figure 1) has applied to the Ohio Water Pollution Control Loan Fund (WPCLF) for \$1.5 million for a sanitary sewer extension project along Lowell Street. This project will connect 16 properties currently using household sewage treatment systems (HSTS). Removing these failing HSTS will prevent untreated sewage from entering local streams.

History & Existing Conditions

The City of Elyria owns and operates a Wastewater Pollution Control Plant (WWPCP) and gravity sewer collection system that serves the majority of the city. The WWPCP discharges to the Black River. Elyria's 170 miles of sanitary and combined sewers drain about 21 square miles, collecting flows from 21,000 residences and 400 industrial and commercial properties.

The Lowell Street project area includes 16 unsewered properties currently utilizing some type of failing HSTS system. On Lowell Street, thirteen properties are residential, three are small businesses, and one is a church-school. The school currently utilizes an on-site treatment facility. With a proposed expansion, the property needs to connect directly to the city sewer system for future maintenance and functionality. The existing sewer on Lowell Street flows to the West Side Interceptor (WSI) sewer.

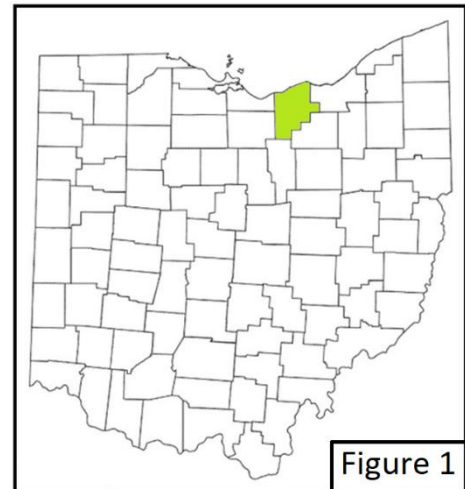


Figure 1

Additionally, there are approximately 200 acres of land along the project's route that could be developed in the future.

Population and Flow Projections

The population of Elyria is 52,853 and the project area population served is approximately 2,000. The city estimates population growth of 10% over the next 20 years. Due to the location of Lowell Street at

the edge of Elyria city limits, the proposed sewer may serve areas of Elyria Township in the future as well.

Elyria's WWPCP treats 9 million gallons per day (MGD) during dry weather and has a maximum operating capacity of 30 MGD and storage capacity for storm events of 3.4 million gallons.

The proposed Lowell Street sewer extension sewer service area anticipates collecting 10,000 gallons per day from the 16 properties. The WWPCP has enough capacity to accept and treat these new flows.

Alternatives

Two alternatives were considered to extend sewers on Lowell Street. No-action is not feasible. Future deterioration of HSTS could cause future water quality issues in an area where connecting to an existing sewer system is a reasonable option.

Alternative 1: Extending sewer to the West Ridge Pump Station. This pump station will need to be improved in order to accept the flows, and installation of new sewer is necessary to reach the pump station. This alternative is significantly more expensive and not feasible.

Alternative 2: Extending Lowell Street gravity sewer, connecting to existing sewer on Lowell Street. The collection system on Lowell Street flows to the WSI sewer, which has capacity for additional flows.

Selected Alternative

The selected alternative, extending gravity sewer on Lowell Street, includes 3,403 linear feet of 15-inch gravity sewer, 875 linear feet of 8-inch gravity sewer, and 15 new pre-cast concrete manholes. The new sewer will be constructed within the current right-of-way on Lowell Street. Disturbed ground will be limited to existing pavement and roadside grass lawn within the right-of-way. See Figure 2 for the project area.

This sewer will serve both the City of Elyria and Elyria Township residents. The new extended sewer will allow the church-school to connect and eliminate their existing on-site sewage treatment package plant.

The sewer is sized to accept flows from future developments south of Lowell Street and north of SR 113 as well as businesses and homes on West River. The future developments will likely be residential and light industrial.

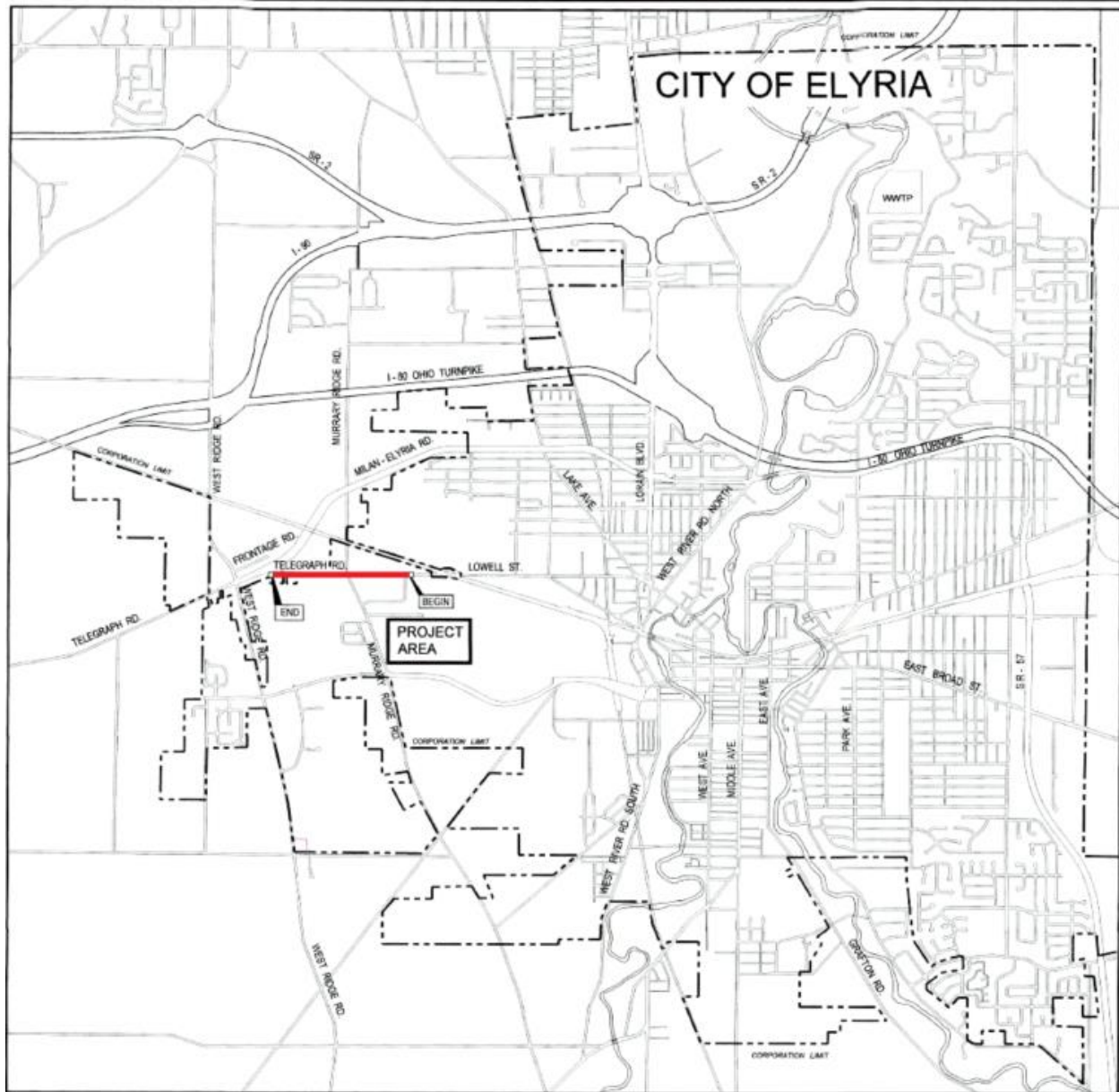


Figure 2. Map of Elyria with project area marked in red

Implementation

Elyria has requested \$1.5 million from the WPCLF at the standard interest rate, currently at 3.58%. During the 20-year loan term, Elyria will save approximately \$474,000 by using WPCLF funding, compared to the market interest rate currently at 5.08%. Interest rates are set monthly and may change for a later loan award.

Current Elyria residential customers and new customers will pay a monthly sewer bill of \$54.50, or \$716 annually. The estimated median household income (MHI) for a resident of Elyria is \$46,034. The average annual sewer bill is 1.5% of the MHI.

Assuming loan award in September 2025, construction will begin shortly thereafter with expected completion by May 2026.

Public Participation

Elyria has made a good effort to include and inform the public about this project. Starting in 2019, the city notified property owners that a future sewer was in the design process. Discussions were held regarding the project in a public meeting on July 10, 2024, and August 5, 2024. Discussions regarding the project were also held with the church-school on January 23, 2024, and February 1, 2024. The city will notify property owners again prior to the start of construction of the proposed project.

Ohio EPA is unaware of any controversy about or opposition to this project. 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 Elyria 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, and Noise: The proposed project will result in a temporary increase in dust, exhaust fumes, and noise from construction activities. This will be mitigated by standard construction best management practices, including emission control on motorized equipment and limiting work hours to the daytime. 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). Because of its temporary nature and the use of emissions controls on motorized equipment, construction vehicle exhaust will be an insignificant pollution source compared to background sources of motorized vehicle exhaust in the greater project area.

Archaeological and Historical Resources: No historic buildings or archaeological resources are recorded in this developed project area within the center of the city. Because the sewer extension is along roads and other areas that have undergone development or disturbance, the project is not likely to impact these resources.

Endangered Species, Fish and Wildlife: The project may require trees to be cut. Threatened and endangered bat species utilize trees as maternal roosting, foraging and breeding habitat. Any tree removal must occur during seasonal window from October 1 to March 30, when bats are not using this habitat.

Local economy: To connect to the sewer, new customers will pay a standard residential sewer tap fee of \$750 and any necessary costs to decommission existing HSTS. By using low-interest WPCLF funding, Elyria is minimizing costs passed on to its users.

Safety, Traffic, and Aesthetics: This project will occur on city property along Lowell Street, and a traffic plan will be maintained by the contractor during construction. Aesthetics will not be permanently altered from a public perspective, and the landscape will be restored once construction is complete. Construction best management practices and safety standards will be followed by the contractors for this project as outlined in detail plan notes.

Surface Water Resources: The project will cross Haag Ditch, a small stream, where it is culverted under Lowell Street. The sewer will be installed by an open trench where it crosses the culvert. The stream bed will not be disturbed, as the culverted area has been modified and the natural stream bed does not exist here. The culvert will remain in place to maintain possible flow. The trench will be stabilized with granular backfill upon completion. Sediment barriers and filtration socks will be installed around the excavations to prevent soil and silt from entering Haag Ditch. Spoil will be taken off site and not disposed of in the ditch.

Unaffected Environmental Features: The project will not impact *Aquatic Habitat, Coastal Zones, Energy Use, Floodplains, Prime Farmland, Recreational Land Use, Safe Drinking Water, Sole Source Aquifers, Terrestrial Habitat, State or Federal Wild or Scenic Rivers, Wetlands, or Drinking Water Resources*. These resources are not present in or near the work site and therefore will not be affected.

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.

This project will result in the elimination of HSTS and a package treatment plant. Additionally, the extended sewer will allow for future development.

Contact information

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