US Army Corps
of Engineers®
Pittsburgh District

Planning and Environmental Branch
William S. Moorhead Federal Building
1000 Liberty Avenue
Pittsburgh, Pennsylvania 15222
412-395-7100

Public Notice Date: 22 March 2024
Expiration Date: 19 April 2024

NOTICE OF AVAILABILITY

Draft Environmental Assessment

Steubenville West End Water Improvements Project in Jefferson County, OH

The U.S. Army Corps of Engineers, Pittsburgh District (USACE) is evaluating a request for Federal funding for the proposed water system improvements project located in the city of Steubenville, Jefferson County, Ohio.

The USACE invites submission of comments on the environmental impact of the approval of the request. The USACE will consider all submissions received before the expiration date of the public comment period. The nature or scope of the proposal may be changed upon consideration of the comments received.

The draft Environmental Assessment and draft Finding of No Significant Impact are available electronically at:

http://www.lrp.usace.army.mil/Missions/Planning-Programs-Project-Management/

Comments can be submitted to the address posted at the top of this notice or to madiosn.duke@usace.army.mil. Comments must be received by 17 April, 2024 to ensure consideration.

FINDING OF NO SIGNIFICANT IMPACT

Steubenville West End Water Improvements Project
City of Steubenville, Jefferson County, Ohio

The U.S. Army Corps of Engineers, Pittsburgh District (USACE) is presenting an environmental analysis in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended. The Environmental Assessment (EA) dated January 2024, for the West End Water Improvements Project, located in the City of Steubenville, Jefferson County, Ohio, evaluates potential environmental impacts associated with a water system improvement project proposed for federal funding under the Section 594 program in the City of Steubenville, Jefferson County, Ohio. The Water Resources Development Act (WRDA) of 1999 (Public Law 106-53), Section 594, allows USACE to consider reimbursement for design and/or construction of environmental infrastructure in Ohio.

The EA, incorporated herein by reference, considered three alternatives for the proposed federal action. The preferred alternative, ultimately the Proposed Federal Action, provides federal funding for improvements to the City of Steubenville's West End Water System to increase the resiliency and reliability of the system without interrupting water service to critical customers, such as the Trinity Medical Center West Hospital. The Proposed Action will include:

- Construction of a 400,000-gallon composite elevated water tank near Coal Hill Road, including a new access road;
- Construction of a booster pump station;
- Improvements to the West End High Service Pump Station, including addition of variable flow control, replacement of a pump, and installation of a new control panel; and
- Installation of approximately 10,000 feet of water line along Coal Hill Road and Lincoln Avenue

In addition to the preferred alternative, a "no action" alternative (the West End Water Improvements Project would not be implemented) was evaluated. A third alternative, where only improvements to the West End Water Tank are implemented was considered but was not evaluated due to the significant disruptions to water service that this alternative would cause. For the preferred alternative and the no-action alternative, the potential effects to the following resources were evaluated:

Table 1: Summary of Potential Effects of the Preferred Alternative and No-Action Alternative (Steubenville West End Water Improvements Project)

	Preferred Alternative	No-Action Alternative

	Insignificant effect	Significant effect	Resource unaffected by action	Insignificant effect	Significant effect	Resource unaffected by action
Surface Water, Ground Water, and Floodplains	☐	☐	☒	☐	☐	☒
Terrestrial Habitat, Wildlife, and Endangered Species	☒	☐	☐	☐	☐	☒
Aquatic Habitat	☐	☐	☒	☐	☐	☒
Air Quality, Dust, Noise, and Odors	☒	☐	☐	☐	☐	☒
Safety and Traffic	☒	☐	☐	☒	☐	☐
Land Use	☒	☐	☐	☐	☐	☒
Archaeological and Historic Resources	☐	☐	☒	☐	☐	☒
Local Economy	☐	☒ Benefit	☐	☐	☒	☐
Climate Change	☐	☐	☒	☐	☐	☒
Child Health and Safety	☐	☒ Benefit	☐	☒	☐	☐
Water Quality	☐	☒ Benefit	☐	☐	☒	☐
Hazardous, Toxic, and Radioactive Wastes	☐	☐	☒	☐	☐	☒
Soils	☐	☐	☒	☐	☐	☒
Public infrastructure	☐	☒ Benefit	☐	☐	☒	☐
Cumulative Effects	☐	☐	☒	☐	☒	☐

The preferred alternative will not discharge dredge or fill material to a water of the United States (WOTUS). There will be no in-water work, no wetlands are present in the project area, and work will primarily be performed in areas in which the predominant covers are paved roads, gravel, and maintained lawns. Therefore, Section 404 (33 USC § 1344) and Section 401 (33 USC § 1341) of the Clean Water Act (CWA) do not apply; permits required under Section 404 and water quality certification required under

Section 401 are not required. No compensatory mitigation is required. Should the scope of the project change or new aquatic resources be identified, all applicable permits must be obtained by the non-federal sponsor prior to initiation of any construction activities.

Pursuant to Section 7 of the Endangered Species Act (ESA) of 1973, as amended, USACE determined that the Proposed Federal Action may affect, but is not likely to adversely affect federally listed species or their designated critical habitat. On 18 August 2023, the U.S. Fish and Wildlife Service provided concurrence with this determination.

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, USACE determined that the Proposed Federal Action does not have the potential to cause effects on historic properties pursuant to 36 CFR § 800.3(a)(1).

Public notice of the proposed action has been initiated. Any received comments will be addressed and included in the Final EA and FONSI.

After having carefully evaluated all aspects of the Proposed Federal Action and based on the EA, I have reasonably concluded that the Proposed Federal Action does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, an environmental impact statement is not required and will not be prepared.

Date

NICHOLAS O. MELIN
Colonel, Corps of Engineers
District Engineer

Scott Swansinger
Project Manager
Pittsburgh District, US Army Corps of Engineers
William S. Moorhead Federal Building
1000 Liberty Avenue
Pittsburgh, PA 15222-4186

Arcadis U.S., Inc.
7575 Huntington Park Drive
Suite 130
Columbus, Ohio 43235
Phone: 614 985 9100
Fax: 614 985 9170
www.arcadis.com

Date: March 8, 2024
Our Ref: 30126293
Subject: **Steubenville West End Water System Improvements Project – United States Army Corps of Engineers Environmental Assessment**

Dear Scott,

This document serves as the response to the United States Army Corps of Engineers (USACE) comments regarding the City of Steubenville, OH West End Water System Improvements Project Environmental Assessment. The comment table provided by USACE is included at the end with responses to each of the comments.

ENVIRONMENTAL ASSESSMENT

Project: West End Water System Improvements Project

Applicant: City of Steubenville
115 South Third Street
Steubenville, Ohio 43952

Project Summary

The City of Steubenville has applied for financing from the Ohio Water Supply Revolving Loan Account (WSRLA) to fund the West End Water System Improvements Project. This project is necessary to improve the aged and deteriorated water distribution system in Steubenville and will include the installation of an elevated water tank, water pumping station, and approximately 10,000 linear feet (LF) of water lines. The estimated loan amount for this project is $3,040,500, with construction scheduled to begin spring 2024 and last approximately 20 months.

History & Existing Conditions

The City of Steubenville (see Figure 1) is located in Jefferson County along the Ohio River. Steubenville's water treatment plant (WTP), located at 1565 University Boulevard, utilizes the Ohio River as its source water, which is then treated by coagulation, flocculation, clarification, filtration, and disinfection prior to distribution. The WTP has an average daily flow rate of 3.8 million gallons per day (MGD). Steubenville's distribution system has recently experienced a disproportionally large number of water line breaks. These breaks are believed to be primarily due to leaky pipes which have exceeded their useful life. Despite having an ongoing water pipe replacement program that prioritizes replacement based on areas with the highest number of pipe breaks, Steubenville has an annual calculated water loss in excess of 65%. Over the last twelve years Steubenville has experienced approximately 80 water line breaks per 100 miles of pipe per year, while the average in the region is approximately 26 breaks per 100 miles of pipe. Water line leaks and breaks create added expense for Steubenville related to routine and emergency repairs, cause boil alerts and necessitate energy and resources for the treatment of a greater volume of water than the customer demand.

On January 12, 2018, in Steubenville's downtown water district, an emergency water system event occurred, resulting from one significant water line break and one non-functioning isolation valve, that was not resolved until January 24, 2018. The event resulted in that service area being without water for a substantial period of time. As a result of this event and city-wide leaks, Ohio EPA issued a deficiency violation to Steubenville on February 7, 2018.

On September 26, 2019, Steubenville received Ohio EPA Director's Final Findings and Orders. The orders require Steubenville to submit quarterly reports showing progress towards improving the resiliency of the water system, including reducing real water loss. To that end, Steubenville has initiated a series of water system studies and projects to improve its system. The city has three distribution districts due to the range of topography withing the city's water service area. The West End Distribution District serves the area of Steubenville from the Hollywood Shopping Center to the Steubenville Country Club. The West End Distribution District is served by the one-million-gallon West End Water Tank, constructed in 2003 and located near Jefferson Community College. The West End Water Tank is supplied with water from the West End High Service Pumps, located at the city's water filtration plant. The West End High Service Pumps operate approximately twice per day to supply the tank with water. When the West End High Service Pump are not operating, the West End Water Tank provides all of the water supply and maintains pressure to the West End Distribution District.

The most recent annual inspections of the West End Water Tank have indicated that the elevated steel tank's cathodic corrosion protection system and the interior coating system are both near the end of the 15-year life expectancy. The tank's interior also has a layer of settled organic matter that may be the source of increasing trihalomethane levels in the West End Water District. Repairs to and replacement of the corrosion protection and coating systems, and removal of organic material are priorities of the city's infrastructure improvement plans. However, this work cannot be performed without significant disruptions to water service in this district for multiple months without an alternative source of water storage or supply. Primary needs for the water system include continued improvements in the aged distribution system. This includes distribution line improvements to aged and leaking lines and elevated water tank improvements.

Population and Flow Projections

Steubenville's population has decreased by approximately 2,000 residents since 2000. During that same period, three major water customers, Wintersville, Jefferson County and RG Steel Mill were lost. Population trends show a likely continued decline in the water system's customer base. In order to maintain good water quality, flow, and pressure, a well-designed storage and distribution system is critical. Therefore, the proposed water storage and distribution improvements are not expected to have impacts on the existing water demands. Given the low projected growth in demand and the large water supply, Steubenville can provide water to the expected 20-year service population without expanding the infrastructure.

Alternatives

<u>No-Action – Alternative #1</u>

The No-Action alternative is an option where federal funding is not provided. Without federal funding the full project is not financially feasible and limited improvements to provide immediate potable water to the community will be constructed. The No-Action alternative will cause significant delays to compliance and puts a burden on the community to continue to rely on aging infrastructure while attempting to raise the funds for the project over several years. The No-Action alternative does not address the project purpose and need; new infrastructure and improvements to existing infrastructure to allow Steubenville to provide appropriate water storage and pressure to the surrounding community. The No-Action alternative leaves the community vulnerable to unreliable potable water service increasing public health risks. In addition, this alternative will cause the City of Steubenville to miss deadlines to spend funding from other agencies already allocated to the project.

<u>Existing West End Water Tank Improvements – Alternative #2</u>

Alternative #2 consists of improvements to the current West End Water Tank and no other project components. Alternative #2 cannot be performed without signification disruptions to water service in the West End Distribution District. The aging infrastructure is in need of improvement due to the relatively high water loss in the distribution system. Without another source of stored water, many residents and businesses would be left without reliable potable water service for multiple months while Alternative #2 was taking place, and therefore this alternative was eliminated from consideration.

<u>West End Water System Improvements Project – Preferred Alternative (Alternative #3)</u>

This alternative will include the construction of a new elevated water tank, new water booster pumping station, new water service lines, and replacement pump. The new elevated water tank, booster pumping station, and water lines will complete a loop in the existing system allowing the community to have continual service while the existing West End Water Tank is taken out of service for long overdue maintenance. The West End Water System Improvements Project will replace existing water mains with new pipes that will reduce the amount of potable water lost from the system. The project will help the community keep reliable potable water service and reduce public health risks.

Selected Alternative – Preferred Alternative

The proposed West End Water System Improvements Project (see Figure 2) will construct a new 400,000-gallon elevated water tank near the intersection of Lovers Lane and Coal Hill Road, and a 1,600-gallon per minute (GPM) water booster pumping station near the intersection of Tweed Avenue and Lincoln Avenue. Additionally, the construction will include replacement of Pump Number 2, addition of variable flow control, and new control panel at the existing West End High Service Pump Station (1565 University Boulevard), and installation of approximately 10,000 LF of water lines along Coal Hill Road and Lincoln Avenue, as well as access roads, fencing, valves, hydrants, and restoration activities. This alternative will provide adequate water storage and pressure for fire prevention and existing customers, creates a water line loop that connects the Downtown High-Pressure Zone to the West End Pressure Zone, provides looping of two dead end water lines, and will allow for the eventual repair and maintenance of the existing West End Water Tank.

Implementation

Steubenville expects to receive grants and funding from U.S. Army Corps of Engineers and the Appalachian Regional Commission (ARC), totaling approximately $1,250,000, and plans to utilize a portion of its American Rescue Plan grant to fund this project. The remaining estimated project amount is $3,040,500, which Steubenville proposes to borrow this balance from the WSRLA, and qualifies for a 20-year, zero percent WPCLF hardship interest rate. Borrowing $3,040,500 at zero percent will save Steubenville approximately $1,500,000 for the 20-year loan period compared to borrowing the same amount at the current market rate of 4.26 percent. Interest rates are set monthly and might change for the month of loan award.

Public Participation

The City of Steubenville has held public meetings to notify residents and businesses about the project, and additional meetings and public notifications will take place shortly after issuance of a construction Notice to Proceed. A public notice announcing the availability of this Environmental Assessment will be posted on City of Steubenville and Ohio EPA Division of Environmental and Financial Assistance websites. The public notice for the Environmental Assessment will be open for a 30-day public comment period. The following agencies reviewed the planning information for this project:

- Ohio Environmental Protection Agency
- Ohio Department of Natural Resources
- Ohio History Connection
- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service

Thus, there have been and will be adequate opportunities for information dissemination and public participation.

Environmental Impacts

The purpose of the West End Water System Improvements Project is to improve the resiliency of the City of Steubenville's water system, specifically the West End Pressure Zone. The West End Pressure Zone contains many of the City's critical customers, including Trinity Medical Center West Hospital. To provide essential services, many of these critical customers require an uninterrupted water supply.

The City's Water Filtration Plant (WFP), located at 1565 University Boulevard, on the north side of Steubenville produces the City's drinking water and houses two sets of high service pumps for pumping to the Labelle Pressure Zone and to the West End Pressure Zone. The West End Pressure Zone is the highest elevated service area in the City. The West End High Service Pumps operate twice per day for approximately four hours to refill the West End Tank. The West End High Service Pumps convey water from the WFP clearwell approximately 3.2 miles through a single 20-inch transmission main to the West End Storage Tank, located near Eastern Gateway Community College. The Downtown High Pressure Zone receives water from a 20-inch transmission main that is gravity fed from WFP clearwell.

The West End Tank provides 1,000,000 gallon of storage and is nearly 20-years old. The calculated storage requirements for the City's West End pressure zone indicates that 1,400,000 gallons of storage are required for the West End Pressure Zone. With the West End Tank having a 1,000,000 gallon capacity, an additional water tank with a 400,000 gallon capacity is needed to meet West End storage requirements. A second tank in the West End Pressure Zone improves resiliency by having two storage tanks. The addition of second tank also allows the City to temporarily remove the existing West End Tank from service for 20-year tank maintenance work that includes cleaning, painting, and anode replacement. The maintenance work is necessary to maintain the 80-year useful tank life and maintain water quality by with cleaning of the tank.

The connection of the two pressure zones increases reliability by providing two ways to supply water to the West End Pressure Zone. The City has previously had a break on the existing 20-inch West End transmission main resulting in a water outage to a significant number of customers, including many critical customer. In the event that the gravity water transmission from the WFP to downtown is disrupted, the connection between the two pressure zones will allow water to be supplied from the West End Pressure Zone to the Downtown High Pressure Zone.

To implement these proposed improvements, the West End Water System Improvements Project consists of a new booster pumping station at Tweed Avenue and Lincoln Avenue in the downtown pressure zone, approximately 5,010 feet of 12-inch water transmission main along Coal Hill Road for pumping water to the West End Pressure Zone from the Downtown High Pressure Zone, approximately 3,840 feet of 12-inch water line on Lincoln Avenue from the 20-inch water line at Lincoln Avenue and South 5th Street to the new booster pump station site, and a new 400,000 gallon water storage tank at Coal Hill Road and Lover's Lane.

The project has the potential to affect the following features, but the effects will be reduced or mitigated to acceptable levels as explained below. The project area consists of all the proposed improvements and the limits of construction/demolition associated with those improvements. The project area limits were determined to be the right-of-way boundaries for the water line and parcel boundaries for the elevated storage tank and booster pump station.

Surface Water, Ground Water and Floodplains:

No-Action Alternative: There will be no effect to surface water and/or ground water as a result of the No-Action Alternative.

Preferred Alternative: Construction of this alternative will not have significant adverse long-term impacts on surface water resources as there will be no in-water work, no wetlands are present in the project area, and work will primarily be performed in areas in which the predominant cover is paved roads, gravel and lawn grass. Minor, short-term impacts from open-cut construction could occur. Excavation of the project area could be prone to erosion and deposition if construction mitigation is not followed. A Stormwater Pollution Prevention Plan (SWPPP), which describes the measures that will be taken to prevent pollution caused by runoff into surface waters, is required, which describes how stormwater runoff will be managed during the project. Dewatering of ground water to enable work below grade may be necessary, but engineering controls are part of the specifications to minimize the impacts of discharging pumped ground water to a river or stream. No impacts to ground water resources are expected as all properties are connected to public water. The areas that makeup the project area are predominately located outside of the 100-year Ohio River floodplain and will add no new aboveground structures in the 100-year floodplain.

Portions of the project are located within the Permars Run 100-year floodplain. Installation of the water line on Lincoln Avenue from Railroad Avenue to Lincoln Boulevard and from Wilson Avenue to Tweed Avenue will be beneath the existing

street. No impact to flood elevations will result from this project. No floodplain permits are required for the installation of the water line.

Based on the above, the project will not result in significant adverse impacts to surface waters, ground water, or floodplains.

Terrestrial Habitat, Wildlife, and Endangered Species:

No-Action Alternative: There will be no effect to terrestrial habitat, wildlife, or endangered species as a result of the No-Action Alternative.

Preferred Alternative: The U.S. Fish and Wildlife Service (USFWS) indicates that the project is within the range of the endangered Indiana bat and endangered northern long-eared bat. Trees within the project area range from scrubby brush and small street trees to larger, mature trees. Other mature trees are located outside of the project area and would provide alternative habitat. Tree removal within the project area will only be permitted October 1 to March 31 or in coordination with USFWS, 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.). Based on average density of trees and acreage of site, it is estimated that approximately 50 to 100 trees greater than 3" DBH will be removed. These tree clearing restrictions will further ensure that any potential impacts to Indiana bats or northern long-eared bats are avoided.

The species of concern eastern hellbender salamander can be found in Jefferson County. However, the project does not include any in-water work, and the project will include adherence to a SWPPP. Therefore, no impacts to this species are anticipated. The species of concern bald eagle can be found in Jefferson County. However, bald eagles are not likely to be present in the project area. This is due to the project area's habitat (busy urban roads, maintained lots, residential and commercial lots) not being conducive to the species as described by USFWS publicly available resources. Therefore, we have determined that the project may affect, but is not likely to adversely affect, the bald eagle.

Coordination with the USFWS was initiated and a clearance letter for the Preferred Alternative was issued on 18 August 2023 (Enclosure A). Based on this information, the project will have no significant short-term or long-term adverse effect on terrestrial habitat, wildlife, or endangered species.

Aquatic Habitat: Neither the No-Action Alternative nor Preferred Alternative will impact the existing aquatic habitat.

Air Quality, Dust, Noise, and Odors:

No-Action Alternative: There will be no effect to air quality, dust, noise, or odors as a result of this alternative.

Preferred Alternative: Jefferson County meets standards for five of the six regulated air pollutants (carbon monoxide, nitrogen oxide, lead, particulate matter and ozone). The area is currently in nonattainment for sulfur dioxide; however, air quality will be unaffected by this project. The project will add no permanent sources of air pollution, although short-term, insignificant increases in dust and local air pollution from construction vehicle exhaust are expected during construction and will be controlled by standard construction best management practices. For these reasons, the project should have no significant adverse short-term or long-term impacts on local air quality.

Effects from dust, noise, and odors will be unavoidable but temporary. Construction noise and vibrations will be controlled using strict specifications included in the construction documents to manage these effects. Work will be restricted to daytime Monday through Saturday unless special approval is granted. The Project area will be cleaned to minimize airborne dust and dust suppressant will be used as needed. Emissions controls on motorized construction equipment will reduce diesel odors. Once the project is complete, the drinking water distribution system will operate with no excessive noise, dust or odors beyond that of a typical water distribution system.

Therefore, the project will neither have significant adverse short-term or long-term impacts to air quality, nor will there be significant adverse long-term impacts from noise, dust, and odors.

Safety and Traffic:

No-Action Alternative: There will be effects to safety and traffic if this alternative is implemented. A lack of federal funding will cause significant delays in the replacement and repair of existing infrastructure. This would exposure the public to more water outages. As portions of the existing water system continue to fail it may result in sudden temporary road closures and changes in traffic patterns.

Preferred Alternative: 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. 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.

Land Use:

No-Action Alternative: There will be no effect to land use as a result of this alternative.

Preferred Alternative: The installation and operation of this water storage and distribution project will have limited indirect, development-related impacts. This is because the current and expected levels of population growth are low in the community surrounding the project area.

Archaeological and Historical Resources:

No-Action Alternative: There will be no effect to archaeological or historical resources as a result of this alternative.

Preferred Alternative: Based on the extensive pre-design review, historic structure avoidance that went into the design of the project, and the results of a limited Phase I Cultural Resource Management survey, Ohio EPA and Steubenville have concluded that no features listed on, or eligible for listing on, the National Register of Historic Places will be adversely impacted by the project. The Ohio State Historic Preservation Office has concurred with this conclusion in their two response letters regarding the Preferred Alternative (Enclosure B).

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.

Local Economy:

No-Action Alternative: There will be a negative effect to the local economy without timely updates to the existing infrastructure. If this alternative is chosen the replacement of this infrastructure could take decades longer to implement. Continued water outages, especially in areas of business, will discourage business from moving in or staying in the area. In addition, water outages in the residential areas will discourage people from moving to or staying in their community. Less business and less residents will lead to a downturn in the economy.

Preferred Alternative: Debt for this project will be repaid from monthly water rates and a Water Infrastructure Improvement Fund fee. Water rates were raised significantly beginning in 2018 and were scheduled to increase annually in anticipation of the various water infrastructure improvements. Likewise, the Water Infrastructure Improvement Fund fee that was instituted has increased annually. The current residential water bill in Steubenville, based on rates set in October 2022 and with average water usage of 4,000 gallons per month, is $65.18, plus a $10.00 Water Infrastructure Improvement Fund fee, for a total of $75.18 per month, or $902.16 per year. This is 2.41 percent of the median household income of $37,457, which is considered high. However, based on the extensive deficiencies within the drinking water infrastructure and various proposed projects, this rate represents the minimum amount necessary to fund the water infrastructure improvements going forward. The installation and operation of this water storage and distribution project will have a neutral impact on the local economy. While increased rates may slow the local economy, clean, reliable drinking water supply is essential for growing the local economy.

Unaffected Environmental Features: Neither the No-Action Alternative nor the Preferred Alternative will impact other environmental features. The project is not located in the Lake Erie coastal zone. No sole source aquifers are present under the project. Farmland will not be developed or impacted by this project.

Climate Change:

Neither the No-Action Alternative nor the Preferred Alternative will have a measurable effect on climate change. Climate change may have an effect on water resources in the form of more frequent unpredictable droughts and floods. Without a safe, reliable water storage and distribution system in place, the water insecurity cause by climate change could be exacerbated. The installation and operation of this water storage and distribution project will have limited indirect, climate-related impacts through improving water availability and security for the community.

Child Health and Safety:

No-Action Alternative: This alternative will have a negative effect on child health and safety by delaying the necessary repairs to infrastructure which supplies potable water to children and their communities.

Preferred Alternative: The installation and operation of this water storage and distribution project will have positive impact on child health and safety by providing reliable drinking water as part of this alternative.

Water Quality:

No-Action Alternative: This alternative will have a negative effect on water quality for the community. There are organic compounds currently in the system, likely from aging pipe and tank linings. Without a more immediate repair and replacement of this infrastructure the public will be exposed to these compounds for a longer time period. Storm water will likely not be impacted by the No-Action Alternative.

Preferred Alternative: The installation and operation of this water storage and distribution project will have positive impact on child health and safety by providing reliable high quality drinking water. The installation and operation of this water storage and distribution project will not impact stormwater quality.

Hazardous, Toxic, & Radioactive Wastes: There will be no impact to this category of materials by the No-Action or the Preferred Alternatives. This project contains no hazardous, toxic, & radioactive wastes.

Soils: There will be no impact to soils during the No-Action or Preferred Alternatives. This project will not impact the local soils.

Hydrology: The No-Action and Preferred Alternative will not impact the hydrology of the site or community. The project will restore the site to the condition it was prior to construction.

Public Infrastructure:

No-Action Alternative: There will be a significant delay in replacing the necessary water infrastructure in this alternative. Without federal funding the project could be delayed several years, maybe decades, and during this time the community will be exposed to water outages, burst pipes, and broken valves.

Preferred Alternative: This alternative will replace public infrastructure that is beyond its useful life and/or failing. The project will add public infrastructure to provide safe drinking water for the community. Streets and sidewalks will be left in an improved condition at the conclusion of this project.

Cumulative Effect:

Cumulative effects are defined as effects on the environment which result from “the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative effects can result from individually minor, but collectively significant actions taking place over a period of time” (40 CFR § 1508.7). The purpose of a cumulative effects analysis is to determine

the magnitude and significance of the environmental consequences of the proposed action in the context of the cumulative effects of other past, present, and reasonably foreseeable future actions.

No-Action Alternative: Without a full replacement of the aging infrastructure the water security of the City of Steubenville cannot be improved in a timely manner. This alternative will likely lead to many small repair and patch jobs to maintain and replace the existing system as it continues to fail over the next decade. Ultimately, this alternative could lead to more public exposure to safety and health risks.

Preferred Alternative: No substantial direct impacts to any resources are anticipated. Implementation of the preferred alternative would provide the City with critical improvements to their drinking water infrastructure. Future development in and around the project area is unlikely to be influenced by the project and no significant indirect impacts to any resources are anticipated. No significant cumulative long-term adverse effects are anticipated as a result of the project. Construction activities, noise disturbance and environmental impacts are minimal and short-term in nature.

Conclusion

Based on the planning documentation, associated correspondence, public participation and the comments from interested agencies, the project (Preferred Alternative) as designed will have no adverse long-term effect on farmland, coastal zones, surface water, ground water, floodplains, wetlands, aquatic or terrestrial habitat, endangered species, state or federal wildlife areas, state-designated scenic or recreational rivers, cultural properties, air quality, or the local economy. It will have no long-term adverse effects with respect to noise, dust and odors. It will have long-term benefits associated with the provision of a safe and adequate supply of potable water that is maintained according to the standards of the Safe Drinking Water Act and is capable of providing adequate and reliable water pressure to support the needs of residential customers and businesses throughout the community surrounding the project area.

Ohio EPA Contact Information

R. Eric Schultz
Division of Environmental & Financial Assistance
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049
Email: eric.schultz@epa.ohio.gov

Sincerely,
Arcadis U.S., Inc.

Matt McCutcheon, PE
Senior Water Engineer
Email: matthew.mccutcheon@arcadis.com
Phone: 614-985-9179

CC. Madison Duke, USACE
Dan Gernant, Arcadis
Jim Jenkins, Steubenville

Enclosures: Figures 1 and 2, Enclosure A USFWS Correspondence, Enclosure B SHPO Concurrence Letters

Arcadis U.S., Inc.
7575 Huntington Park Drive
Suite 130
Columbus, Ohio 43235
Phone: 614 985 9100
Fax: 614 985 9170
www.arcadis.com

FIGURES

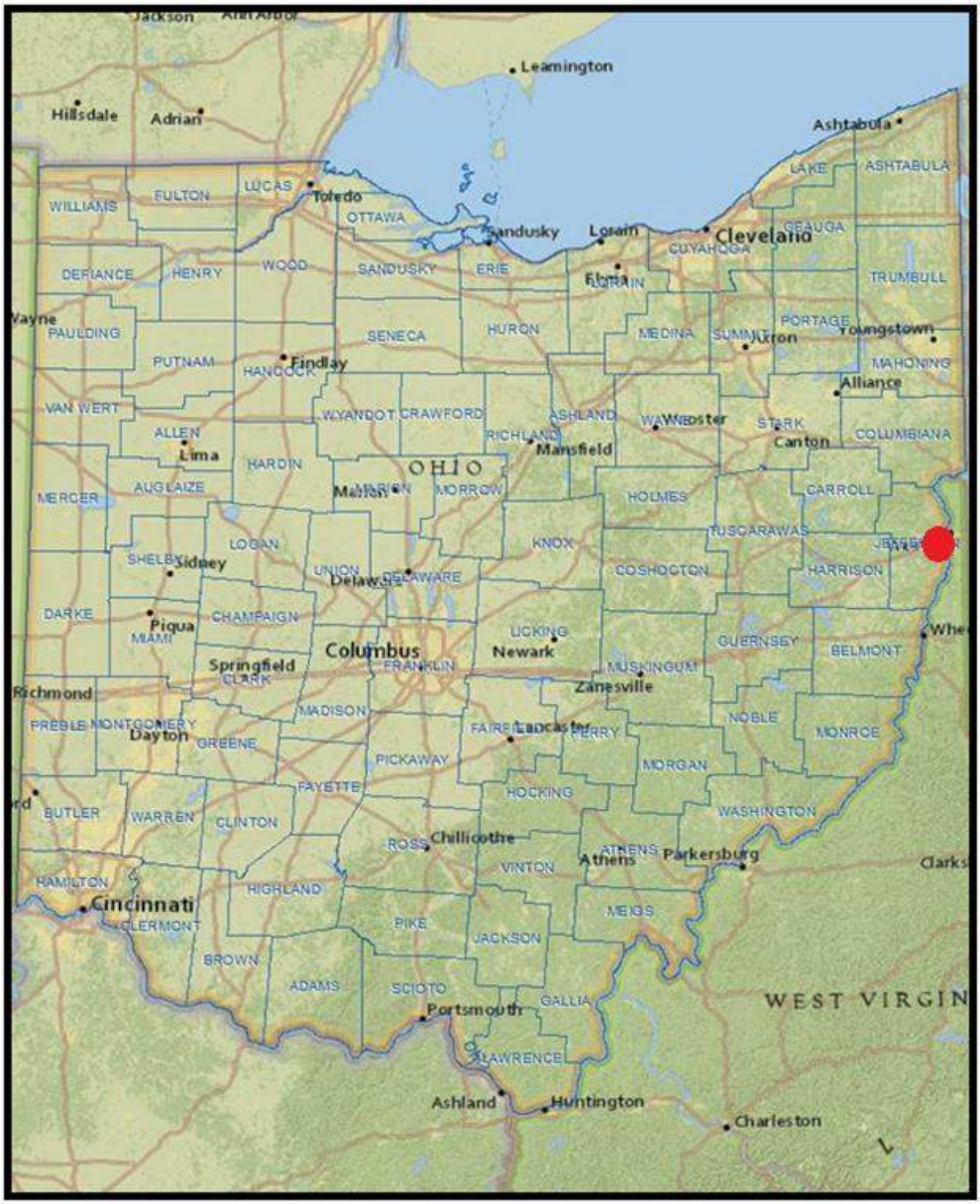

Figure 1: General Project Location

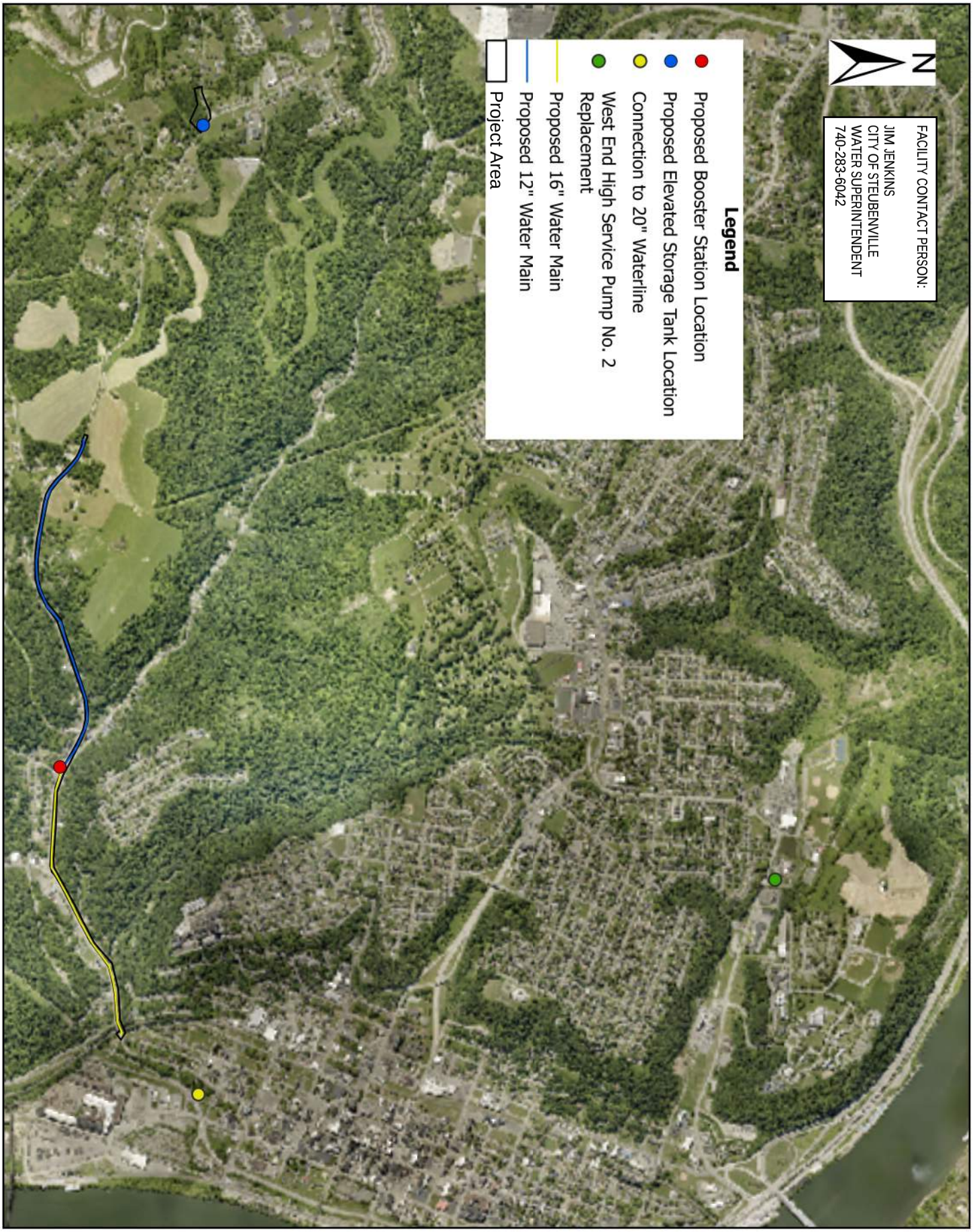

Figure 2: Project Area

ENCLOSURE A

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994

August 18, 2023

Project Code: 2022-0026109

Dear Mr. Miller:

The U.S. Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse effects to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

The Service has reviewed your project description and concurs with your determination that the project, as proposed, is not likely to adversely affect the federally endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) and will not jeopardize the tricolored bat (*Perimyotis subflavus*). This is based on the commitment to cut all trees ≥3 inches diameter at breast height only between October 1 and March 31 in order to avoid adverse effects to the Indiana bat, northern long-eared bat, and tricolored bat.

This concludes consultation on this action as required by section 7(a)(2) of the ESA. Should, during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be reinitiated to assess whether the determinations are still valid.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

Keith Lott
Acting Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Eileen Wyza, ODNR-DOW

ENCLOSURE B

In reply refer to:
2022-JEF-55049

June 22, 2022

April Greenberg, M.A., RPA
Arcadis U.S., Inc.
4665 Cornell Road, Suite 200
Cincinnati, Ohio 45241
Email: april.greenberg@arcadis.com

RE: Section 106 Review-Phase I Archaeological Survey for the City of Steubenville's West End Water Tank Project, Jefferson County, Ohio

Dear Ms. Greenberg:

This letter is in response to the receipt on June 6, 2022 of *Phase I Archaeological Survey for the City of Steubenville's West End Water Tank Project, Jefferson County, Ohio* by Arcadis U.S., Inc. (Galantich and Haag 2022). We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code (O.R.C.) requesting cooperation among state agencies in the preservation of historic properties. The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The proposed project involves the construction of a new above-ground water storage tank within an approximately 2.2-acre parcel, approximately 1.67-miles of connecting water line within the existing right-of-way (ROW) of Coal Hill Road, an approximately 0.23-acre booster station parcel, and a nearly 0.03-acre workspace for a 20-inch diameter transmission main. Overall, the project footprint is 11.05-acres however the current survey focused on the 2.2-acre parcel since the remaining portions are within previously disturbed contexts (e.g., road ROW). The architectural component will be submitted in a stand-alone report and therefore the review will be under a separate cover.

The archaeological survey involved a literature review, visual inspection, and shovel test unit excavations of the entire APE, as defined above. The literature review revealed no previously documented archaeological sites within the APE. Furthermore, it was determined that the APE had not been subjected to any previous cultural resource studies prior to this investigation. The results of the field work did not identify any archaeological deposits within the APE. Therefore, after careful review of the above referenced report, the SHPO concurs with Arcadis U.S., Inc. that, as designed, there will be no effect on significant archaeological resources within the APE. No further archaeological investigations are warranted for the APE unless the scope of work changes or archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as required by 36 CFR § 800.13. If you have any questions concerning this review, please contact me via email at sbiehl@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Stephen M. Biehl, Project Reviews Coordinator (archaeology)
Resource Protection and Review
State Historic Preservation Office RPR Serial No. 1093653

"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."

In reply, please refer to:
2022-JEF-55049

July 26, 2022

Tegan Baiocchi
Architectural Historian – Arcadis U.S., Inc.
111 W Berry Street, Suite 211
Fort Wayne, IN 46802

RE: City of Steubenville's West End Water Tank Project, Jefferson County, Ohio

Dear Ms. Baiocchi:

This letter is in response to correspondence received on June 28, 2022. The comments of the Ohio State Historic Preservation Office (SHPO) are made in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

On behalf of the City of Steubenville, Arcadis U.S., Inc. is proposing the installation of a water storage tank, a booster pump station, and a connecting water line. The total project footprint totals 11.05 (4.47 hectares). Within the 2.2-acre (0.9-hectare) water tank workspace, an approximately 150-foot-tall water tank will be constructed. The widest portion of the water tank will be 70 feet in diameter, while the column will be approximately 24 feet wide. The Phase I archaeology report was submitted separately and has received separate concurrence June 22, 2022. The submission identified 117 buildings within the 0.5-mile APE for Visual Effects; one (1) Ohio Historic Inventory (OHI) property was identified.

Based on the information submitted, the SHPO requires more information on the below-listed properties in order to make a final determination of eligibility for listing in the National Register of Historic Places:

54 Villa Dr, Steubenville
624 Lovers Ln, Steubenville – Aquinas Central Catholic School; Stark Grade School (JEF0050311)

However, due to the minimal visibility between the properties and the project site, it is the opinion of the SHPO that the proposed work should not impact the significance or integrity of the above properties in a way that would alter their National Register eligibility. Therefore, the proposed water tower construction will have no effect on historic properties. No further coordination with this office is necessary, unless there is a change in the proposed project.

If you have any questions, please contact me at mfisher@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Miranda Fisher
Project Reviews Manager – Architecture
Resource Protection and Review
State Historic Preservation Office

"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."
RPR Serial No: 1093929