



May 22, 2024

Limited Environmental Review and Finding of No Significant Impact

**West Creek Conservancy – Bridge Creek Headwaters Preserve
Geauga County**

WRRSP number: WR392014-0003

Sponsor: City of Lorain – PQM WWTP Improvements

Lorain County

Loan number: CS390532-0040

The attached Limited Environmental Review (LER) is for a nonpoint source project in Geauga County which the Ohio Environmental Protection Agency intends to finance through its Water Resource Restoration Sponsor Program (WRRSP). 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 the environmental effects of proposed projects as part of its WRRSP 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 qualify 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, the award of funds may proceed without further environmental review or public comment unless new information shows that the environmental conditions of the proposed project have changed significantly.

Sincerely,

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

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

WRRSP Project: Bridge Creek Headwaters Preserve
WRRSP Applicant: West Creek Conservancy
WRRSP Loan: WR392014-0003

Sponsoring Community: Lorain
Sponsoring Project: PQM WWTP Improvements
Sponsoring WPCLF Loan: CS390532-0040

Project Summary

West Creek Conservancy (West Creek) seeks \$881,922 in funding through Ohio EPA's Water Resource Restoration Sponsor Program (WRRSP) to purchase and protect six parcels for the 108-acre Bridge Creek Headwaters Preserve property. The Preserve includes 90 acres of Ohio Rapid Assessment Method (ORAM) Category 3 wetland (highest quality) within the Upper Cuyahoga River basin of the Cuyahoga River watershed. The extensive wetland complex drains into a tributary of Bridge Creek, draining into the LaDue Reservoir, a City of Akron drinking water impoundment. The project is located along Safford Road in Auburn Township, Geauga County (Figure 1 and Figure 2).

The City of Lorain will sponsor the project through a Water Pollution Control Loan Fund (WPCLF) loan administered by Ohio EPA's Division of Environmental and Financial Assistance (DEFA). Funds for the Bridge Creek Headwaters Preserve project will be provided by advancing a portion of the interest to be paid by Lorain on its \$10,000,000 PQM Wastewater Treatment Plant Improvements project. This project is scheduled to be awarded WPCLF funding in June 2024. By voluntarily agreeing to sponsor the Bridge Creek Headwaters Preserve project, Lorain is eligible for an up to 0.1% discount that will reduce its WPCLF loan rate.

The purpose of the WRRSP is to counteract the loss of ecological function and biological diversity that jeopardizes the health of many of Ohio's water resources. In the program, entities such as park districts and land conservancies (implementers) undertake ecologically restorative and protective projects. Borrowers from the WPCLF voluntarily sponsor such projects in return for interest rate discounts. Ohio EPA foregoes a portion of the interest that borrowers would repay to the WPCLF and advances it to implementers to carry out ecologically beneficial projects. Properties are acquired, restored, and managed in perpetuity under a management plan and an environmental covenant, which establishes use restrictions on the land.

History & Existing Conditions

The Cuyahoga River flows through six Ohio counties and several major municipalities. The Cuyahoga River watershed drains 812 square miles through three distinct segments: the Upper (headwaters), Middle, and Lower. In general, the upstream sections are more rural, natural, wetland, and forest, while the downstream sections are increasingly impaired, urban, residential, commercial, and industrial.

The Upper Cuyahoga River basin drains 351 miles of headwater streams and covers approximately 207 square miles. Land cover is predominantly deciduous forest but development concerns are becoming more pronounced. The City of Akron owns 12% of the land in the watershed and manages it to protect drinking water resources.

LaDue Reservoir-Bridge Creek is a subwatershed within the Upper Cuyahoga River basin. This subwatershed drains 38.79 square miles and includes the City of Akron's largest reservoir, the LaDue Reservoir, and the Bridge Creek Preserve project site. Land use within the subwatershed includes forest, row crops, development, grass/pasture, and others. Land use surrounding the project property is primarily low-impact and includes deciduous forest, the extension of the onsite wetlands, several single-family housing developments, and light commercial establishments.

Within and surrounding the project site are approximately 120 acres of a beaver and groundwater-influenced wetland complex primarily fed by and draining to an unnamed tributary to Bridge Creek, which drains into the LaDue Reservoir. The project site features 90 acres of this wetland consisting of high-quality, emergent, and scrub-shrub vegetation, and forested wetlands surrounding the deeper marsh and ponded areas. The wetland's hydrology is impacted by dams, fords, and culverts.

A large portion of the project property was formerly occupied by the Auburn Airport (270I) which is privately owned and was used for light aircraft. The airport was established between 1970 and 1982 and closed between 2009 and 2018, although the Federal Aviation Administration still lists its status as "operational." The airport consisted of two grass field airstrips/runways. The earthen remnants of the north/south runway and the east/west runway and an old hangar or garage remain onsite.

A portion of each parcel on the project site is included in the plat map of the Auburn Springs Country Club Estates (1978), which depicts a residential subdivision for homes. Some of the home sites were never built upon. The entire property was listed for sale on the open market. If the project property is not preserved, it will likely be developed. If such development occurs, there would be significant detrimental impacts to the wetland complex and the downstream aquatic resources. Development of the site could cause water quality impairments such as filling, draining, culverting, and sedimentation. Protection of this wetland, and the water quality functions it provides, will improve and maintain water quality within the Cuyahoga River Watershed.

The Upper Cuyahoga River subwatershed is also home to ecologically significant protected areas including Geauga Park District's Burton Wetlands which include Lake Kelso and the Charles Dambach Preserve, and Bass Lake Preserve which includes the Spring Brook Sanctuary (State Nature Preserve); the Ohio Department of Natural Resources' Punderson State Park and Auburn Marsh Wildlife Area; and The Nature Conservancy's Lucia S. Nash Preserve that includes Snow Lake.

Project Description

The Bridge Creek Headwaters Preserve project is an opportunity to preserve a 108-acre property that includes 90 acres of Category 3 wetlands. Category 3 wetlands are the highest quality wetlands; they provide valuable habitat and important water quality benefits. Wetlands function as a natural sponge, they store and filter water, which reduces erosion and mitigates the impacts of floods. Thus, the proposed protection and preservation of the wetland complex will result in the protection and improvement of water quality in the Cuyahoga River Watershed. It will also result in habitat protection of a high-quality wetland that is home to over 215 animal species, including 11

state-listed species, one federally protected species, one state and federally endangered species, and a globally imperiled species. The project site is also home to over 167 plant species including three state-listed and one formerly state-listed species.

West Creek Conservancy will purchase and protect six parcels at fair market value and maintain permanent ownership and stewardship. Once acquired, the property will be managed to protect the water quality and ecological value of the wetland complex. The focus of this project is the preservation of Ohio's highest-quality wetland resources. The project includes invasive species control, potentially limited native tree plantings, and the maintenance and management of the existing hangar/garage, driveway, and parking area. The project also involves the removal and proper disposal of trash, heavy equipment, and construction supplies that were found on the site.

An environmental covenant will be recorded on the property.

Property Management and Maintenance

The preserve will be restricted to passive uses such as hiking, bird watching, and educational research. West Creek will implement invasive species management on the preserve, which will require a systematic approach over ten to twenty years. West Creek will also implement long-term monitoring and assessments of the overpopulation of wildlife. The property will be protected in perpetuity through use restrictions spelled out in an environmental covenant, which will be part of the deed. Above any other competing management objectives, the protection and preservation of the water resources, as specified in the environmental covenant, shall rule the management of the WRRSP-protected property.

These restrictions include:

- There shall be no agricultural, industrial commercial, or residential activity undertaken or allowed.
- The property may not be divided, partitioned, subdivided, or conveyed except in its current configurations.
- There shall be no buildings or other structures, including, but not limited to, billboards or advertising of any kind, camping accommodations, and mobile homes shall not be erected or placed.
- There shall be no mining, drilling, exploring for, or removal of minerals, oil, or gas.
- There shall be no ditching, draining diking, filling, excavating, or removal of topsoil, sand, gravel, rock, or other materials, except as may be necessary for reasonable preservation, management, and restoration purposes.
- There shall be no manipulation or alteration of wetlands, creeks, streams, surface or subsurface springs, or other bodies of water. Reasonable alternations to surface water bodies and their associated riparian zones may be permitted to protect or improve water quality or aquatic habitat, upon the condition that prior to any such alterations, a plan for such activities shall be proposed in writing by the Owner or any Transferee and shall be approved by Ohio EPA or shall be approved as an amendment to the Project Management Plan.
- There shall be no open dumping.
- There shall be no building of new roads or other rights-of-way. Existing roads may be maintained but shall not be widened or improved.

- There shall be no operation of automobiles, trucks, snowmobiles, dune buggies, motorcycles, all-terrain vehicles, or any other motorized recreational vehicles.
- In accordance with state regulations and as approved by Ohio EPA and authorized by the Owner, hunting and trapping may be permitted to maintain ecological balance or to protect human health and safety.
- Except in areas already identified in the Plan as being disturbed, and as may be necessary for reasonable preservation, management, or restoration purposes, to protect human health and safety, or to maintain a diversity of naturally occurring habitat types and control of exotic non-native and exotic species of plants, there shall be no removal, destruction, cutting, trimming or mowing of any trees or other vegetation and no non-native species shall be introduced.

Implementation

The WRRSP loan award for West Creek Conservancy's Bridge Creek Headwaters Preserve project will be made possible through Lorain's PQM Wastewater Treatment Plant Improvements project WPCLF loan award, which is scheduled for June 2024. With an approved sponsorship agreement and environmental covenant, West Creek Conservancy can undertake land acquisition with WRRSP funds at any time between the dates of the WPCLF loan award, and the end performance certification for the sponsoring WPCLF project. The WRRSP project spending must be completed before the certification of operation of the sponsoring wastewater project.

Stewardship of the acquired property will be in perpetuity. As noted previously, an environmental covenant will be developed for the property acquisition that will be recorded with the deed once purchased. The covenant should help ensure that all affected property is preserved in perpetuity in an environmentally sound manner.

Public Participation

West Creek Conservancy will issue a press release within Geauga County to announce the permanent protection of the project property. It will also be announced on their website (www.westcreek.org/projects/), social media, in the organization's newsletters, and annual report. The project will also be highlighted in West Creek's Seasonal Hike Series, which offers educational hikes guided by WCC staff, partners, and volunteers to members of the public. All events and public hikes are listed on the organization's events webpage: www.westcreek.org/events/.

As part of its State Environmental Review Process, DEFA will post this LER and Finding of No Significant Impact to its web page located at: www.epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements

Conclusion

Ohio EPA conducts environmental reviews of all projects before awarding WPCLF/WRRSP financing. Ohio EPA's State Environmental Review Procedure contains specific review criteria to be used for determining whether or not projects "will...individually, cumulatively over time, or in conjunction with other Federal, State, local or private actions have a significant adverse effect on the quality of the human environment." The proposed project identified no potentially significant adverse impacts on the quality of the human environment or sensitive resources such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, threatened or endangered species, or historic artifacts or properties.

Because the proposed WRRSP project is a water quality project consisting of non-structural practices, is sufficiently limited in scope, and meets all applicable criteria, a Limited Environmental Review (LER) is warranted. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will require no specific impact mitigation as the planning activities for the project identified no potential adverse impacts to the quality of the human environment or sensitive resources such as floodplains, wetlands, state or federally-designated wild, scenic, or recreational rivers, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, air quality or threatened or endangered species. The proposed project will have beneficial environmental impacts by preserving a high-quality wetland that is home to over 215 animal species and over 167 plant species.

Will have no effect on high-value environmental resources since it will protect the quality of the Upper Cuyahoga River basin and the LaDue Reservoir-Bridge Creek subwatershed by permanently protecting the property's wetland and associated forested buffer.

Is not a controversial action as it will benefit the environment and no significant public opposition has been expressed.

Does not create a new or relocate an existing discharge to surface or ground waters since the proposed project does not involve a point source discharge.

Will not provide the capacity to serve a population substantially greater than the existing population since the proposed project is not a publicly owned wastewater treatment works designed to serve a designated area. Instead, it is a protection project of high-quality aquatic resources.

West Creek Conservancy will be responsible for implementing the management plan prepared for this project. West Creek Conservancy has been involved with land protection and stewardship for over 25 years and is responsible for thousands of acres of critical habitat in northeast Ohio. This organization has the experience and qualifications to manage the property once it is acquired.

Contact information

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Figure 1. Project location map



Figure 2. Water resources map