



## NORTHEAST OHIO AREAWIDE COORDINATING AGENCY

### MEMORANDUM

**TO:** NOACA Board of Directors

**FROM:** Grace Gallucci, Executive Director

**DATE:** March 6, 2015

**RE:** **Resolution No. 2015-027: Facility Planning Area (FPA) Transfer Request: Lorain County/Northeast Ohio Regional Sewer District Southwest FPA; Declaration of Prescriptions for Wastewater Treatment for Columbia Township, Lorain County**

#### **ACTION REQUESTED**

The Board of Directors is asked to adopt **Resolution No. 2015-027**, which approves the proposed FPA modification between the Lorain County FPA and the Northeast Ohio Regional Sewer District (NEORS) FPA, the declaration of prescriptions for wastewater treatment in Columbia Township.

#### **PREVIOUS ACTION**

The Water Quality Subcommittee, Planning and Programming Committee and Executive Committee have recommended approval of this action.

#### **BACKGROUND/JUSTIFICATION FOR CURRENT ACTION**

As an areawide water quality management agency, NOACA is contracted by the Ohio EPA to maintain current and accurate wastewater FPA boundaries and prescriptions for its five-county region. The Lorain County Sanitary Engineer has requested a transfer of 29 parcels totaling 97.19 acres from the Lorain County FPA to the NEORS Southwest FPA. Lorain County is the current designated management agency (DMA) for the parcels which are entirely within Columbia Township. Attachment 1 shows the location of the transfer request in Columbia Township.

The transfer of the parcels along Redfern Road (State Route 252) and East River Road is requested because Lorain County will be installing sanitary sewers along these roadways as part of a development agreement. The proposed sewer lines will gravity flow to a soon-to-be built lift station that will pump the wastewater through a force main to a nearby sewer line to be treated at the NEORS's Southerly Wastewater Treatment Plant (WWTP). The current boundary between the Lorain County and NEORS Southwest FPAs runs down the center of Redfern Road and East River Road. Because of the FPA boundary location, the parcels located in the Lorain County FPA directly north of Redfern Drive and west of East River Road cannot connect to sanitary sewers flowing to the Southerly WWTP because the parcels are not in the NEORS Southwest FPA. The proposed FPA amendment would transfer 24 parcels to the Southwest FPA enabling the parcel owners to connect to the planned sanitary sewer line. The NEORS and Columbia Township Trustees support the parcel transfer request (see attachments).

In addition, five parcels south of Sprague Road near the intersection of Columbia West River Road are included in the parcel transfer request. These parcels are currently within the Lorain County FPA, but are served by the NEORS in accordance with their 2013 Lorain County Service Agreement. Therefore, the connection of these parcels to sewers flowing to the NEORS's Southerly WWTP is currently not consistent with NOACA's Clean Water 2000 Plan. This inconsistency to the Plan was discovered during the review of the Lorain County transfer request along Redfern Drive and East River Road. NOACA discussed the issue with each DMA and received approval from Lorain County and the NEORS to add these five parcels along Sprague Road to Lorain County FPA transfer request.

The Lorain County Sanitary Engineer is also requesting a change to the Columbia Township prescriptions. Prescriptions are the wastewater management option(s) agreed upon by local communities and the DMA. In the majority of Columbia Township, the wastewater management options have not been declared in NOACA's Plan resulting in a prescription of "sewer plans undeclared" (Attachment 2). Appendix 4-2, Criterion 4 of NOACA's Plan deems the installation, or extension of sanitary sewers in areas where sewer plans are undeclared to be inconsistent with the Plan. Consistency with NOACA's Plan is required by the Federal Clean Water Act in order for the Ohio EPA to issue Permits-to-Install sanitary sewers.

The Lorain County Sanitary Engineer, with support from the Columbia Township Trustees, is requesting that the portions of Columbia Township with the current prescription of "sewer plans undeclared" (Attachment 2) be changed to the prescription of "sewers expected within 20 years" (Attachment 3). The proposed prescription change would make sanitary sewer installations and extensions in Columbia Township consistent with NOACA's Plan. Lorain County and Columbia Township have requested the prescription change because commercial and residential development is expected to continue in the Township requiring the installation and extension of sanitary sewers to adequately convey and treat the wastewater from these future development areas.

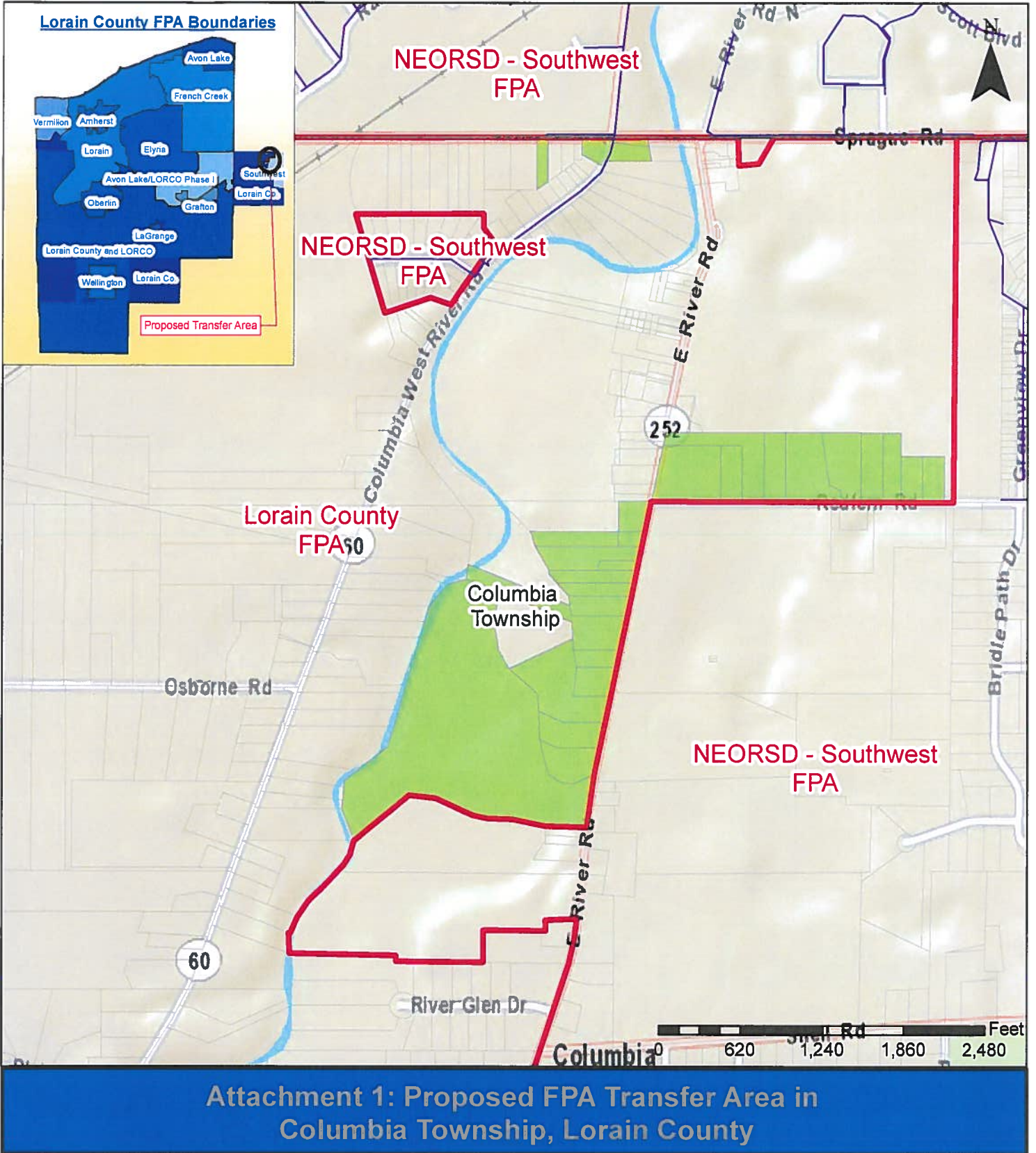
#### **FINANCIAL IMPACT**

NOACA's approval of the boundary change will not result in any financial impact to NOACA.

#### **CONCLUSION/NEXT STEPS**

With Board approval, the FPA and prescription updates will be submitted to the Ohio Environmental Protection Agency.

GG/ks



**Attachment 1: Proposed FPA Transfer Area in Columbia Township, Lorain County**

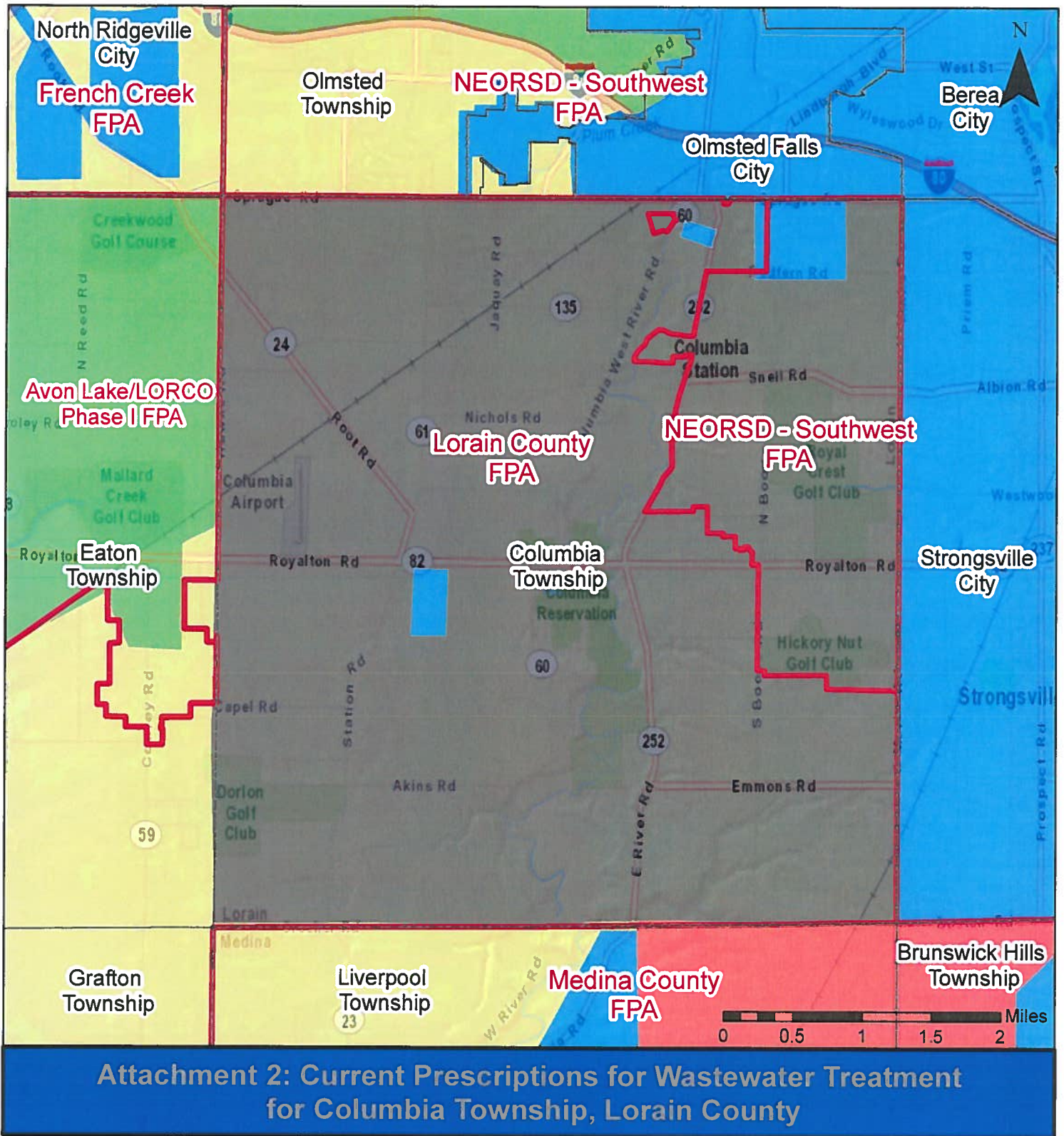
- Current FPA Boundary (2015)
- Jurisdiction Boundary
- Parcel Boundary
- Parcels to be Transferred to the Southwest FPA
- Sewer Line



**DRAFT**  
1/28/2015

Data Sources:  
NEORSD  
Lorain County Sanitary Engineer  
Lorain County Auditor  
NOACA

NOACA makes no representations or warranties with respect to the accuracy and/or completeness of the map.



**Attachment 2: Current Prescriptions for Wastewater Treatment for Columbia Township, Lorain County**

**Current Prescriptions for Wastewater Treatment (2006)**

- Currently Sewered
- Sewers Expected Within 20 Years
- Limited Sewers Likely Within 20 Years
- Local Wastewater Planning Options
- Area Served by On-Site Systems
- Sewer Plans Undeclared

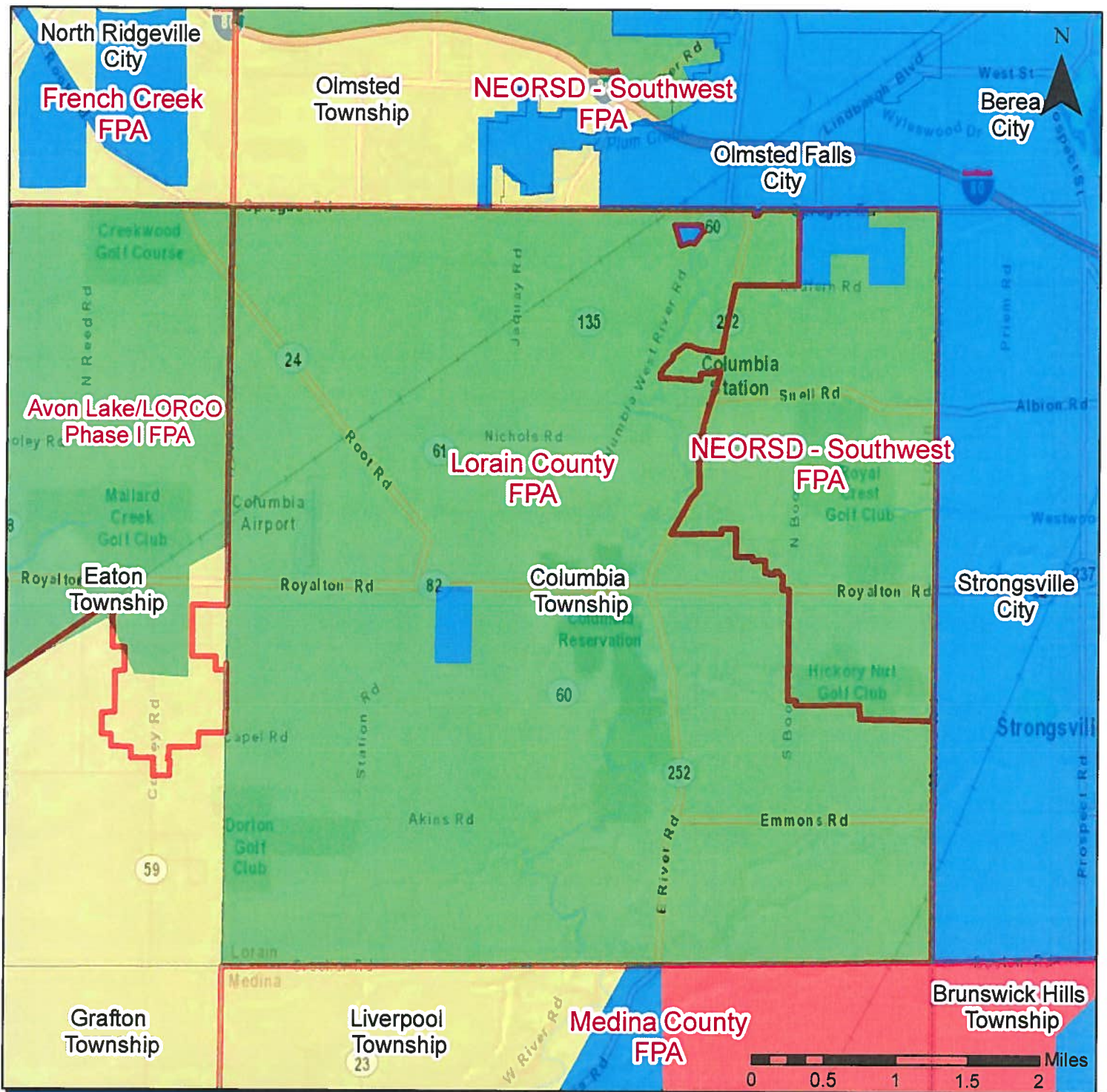


- Current FPA Boundary (2015)
- Jurisdiction Boundary

Data Sources:  
 NEORSD  
 Lorain County Sanitary Engineer  
 Lorain County Auditor  
 NOACA

**DRAFT**  
 1/28/2015

NOACA makes no representations or warranties with respect to the accuracy and/or completeness of the map.



### Attachment 3: Proposed Prescriptions for Wastewater Treatment in Columbia Township, Lorain County

#### Proposed Columbia Township Prescriptions for Wastewater Treatment (2015)

- Currently Sewered
- Sewers Expected Within 20 Years
- Limited Sewers Likely Within 20 Years
- Local Wastewater Planning Options
- Area Served by On-Site Systems
- Sewer Plans Undeclared



- Current FPA Boundary (2015)
- Jurisdiction Boundary

Data Sources:  
 NEORSD  
 Lorain County Sanitary Engineer  
 Lorain County Auditor  
 NOACA

**DRAFT**  
 1/28/2015

NOACA makes no representations or warranties with respect to the accuracy and/or completeness of the map.



## Facility Planning Area (FPA) Transfer Request Form

**Applicant:**

Lorain County

**Location of Transfer Area (Include Map):**

The transfer areas are along Redfern Drive, East River Road, and Sprague Road in Columbia Township, Lorain County (Attachment 1).

**Transferring From:**

Lorain County FPA

**Transferring To:**

Northeast Ohio Regional Sewer District (NEORS) Southwest FPA

**Total Acres In Transfer Area:**

97.19 Acres

**Total Parcels In Transfer Area:**

29 Parcels

**List of Affected Parties:**

Lorain County, NEORS, and Columbia Township

**208 Plan Consistency Review**

**Facility Planning Area Review - Applicant Needs to Solicit Support from Affected Parties**

- Applicant is the Designated Management Agency for all of the affected area.
- Applicant is not the Designated Management Agency for all or part of the affected area
  - Applicant **has** secured the approval of the entity or entities that are.
  - Applicant **has not** secured the approval of the entity or entities that are.

### Service Extension/Community Plan Review – Transfer Should be Consistent with the Prescriptions for Wastewater Treatment<sup>1</sup>

- Applicant **does not** propose the extension of any sewer service.
  - The proposed project is limited to sewer system rehabilitation work.
  - The proposed project is limited to a plant expansion or modification to better handle wet weather flow volumes
- ✓ Applicant **does** propose the extension of sewer service to an area lying entirely within the established facility planning area of the project sponsor.
  - The proposed extension **is** consistent with the current Prescriptions for Wastewater Treatment for the affected area.
  - The proposed extension **is not** consistent with the current Prescriptions for Wastewater Treatment for the affected area.
  - ✓ The applicant proposes **new** Prescriptions for Wastewater Treatment for the affected area.

### Plant Expansion Review (if applicable)

- The application involves a plant capacity expansion that **is** consistent with extant population projections included in the Clean Water 2000 Plan as most recently updated.
- The application involves a plant capacity expansion that **is not** consistent with extant population projections included in the Clean Water 2000 Plan as most recently updated.
  - The applicant **has** provided information that **has** sufficiently resolved any population project discrepancy.
  - The applicant **has not** provided information that sufficiently resolved the population projection discrepancy.

### Staff Comments:

The Lorain County Board of Commissioners will be installing sanitary sewers along Redfern Drive and East River Road (State Route 252) in Columbia Township. The sewers will gravity flow to a soon-to-be-built lift station which will pump the wastewater through a force main to a nearby sewer line for treatment at the Northeast Ohio Regional Sewer District's (NEORSD's) Southerly Wastewater Treatment Plant (WWTP). The current boundary between the Lorain County and the NEORSD Southwest Facility Planning Areas (FPAs) runs down the center of Redfern and East River Roads. The parcels on the north side of Redfern Road and west side of East River Road can not connect to the proposed sewer line because the parcels reside in the Lorain County FPA. The transfer requested would move these parcels with frontage to the County's future sewer line into the NEORSD Southwest FPA enabling parcels to connect to the sanitary sewers (Attachment 1). The NEORSD and the Columbia Township Trustees support the FPA boundary change request (see attached letters).

During the review of the Lorain County FPA transfer request, NOACA staff identified inconsistencies between the NEORSD Southwest FPA and the NEORSD's 2013 Lorain County Service Agreement. Specifically, five parcels south of Sprague Road near the intersection of Columbia West River Road are currently within the Lorain County FPA,

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<sup>1</sup> Prescriptions for Wastewater Treatment are referred to as Community Plans for Wastewater Treatment in the *Clean Water 2000* plan.

but are served by the NEORSD in accordance with their service agreement. Therefore, the connection of these parcels to sewer lines flowing to the NEORSD's Southerly WWTP is currently not consistent with NOACA's Clean Water 2000 Plan (Plan). The transfer of these five parcels is needed so the NEORSD service agreement area along Sprague Road is consistent with NOACA's Plan.

The lack of prescriptions for wastewater treatment (prescriptions) for the majority of Columbia Township is the second issued addressed in this FPA amendment request. The Lorain County Sanitary Engineer, with support from the Columbia Township Trustees, is requesting that the areas currently shown as "sewer plans undeclared" (Attachment 2) to be changed to the prescription of "sewers expected within 20 years" (Attachment 3). Appendix 4-2, Criterion 4 of NOACA's Clean Water 2000 Plan (Plan) deems the installation or extension of sanitary sewers in areas where sewer plans are undeclared to be inconsistent with the Plan. Consistency with the Plan is required by the Federal Clean Water Action in order for the Ohio EPA to issue Permits-to-Install sanitary sewers. The proposed prescriptions for Columbia Township would make the current and future sanitary sewer installations and extensions in Columbia Township consistent with NOACA's Plan.

**Staff Disposition:**

The staff recommends approval of the proposed amendment to the FPA boundary line between the Lorain County and the NEORSD Southwest FPAs. Lorain County is the current designated management agency (DMA) for the transfer areas and has the support of proposed DMA, NEORSD, and Columbia Township. The NEORSD, at the request of Lorain County Commissioners, has modified their Lorain County Service Agreement to include all the parcels in the proposed transfer area.

The staff also recommends approval of the changes to the Prescriptions for Wastewater Treatment (prescriptions). Policy 4-3 of the Clean Water 2000 Plan states the development of wastewater management options should be completed by the DMA in consultation with affected local jurisdictions. Lorain County has worked with and garnered support from the Columbia Township Trustees for the proposed prescription update. The prescriptions change will allow for the installation and extension of sanitary sewers in the township. Columbia Township anticipates the need for the installation and extension of sanitary sewers due to the continued growth of both commercial and residential development in the Township.

**Water Quality Subcommittee Disposition:**

At the January 30 meeting, the Water Quality Subcommittee reviewed and recommended approval of the proposed FPA modifications.

**Planning and Programming Committee Disposition:**

Action Item for February 13, 2015

**Executive Committee Disposition:**

**Board of Directors Disposition:**



RESOLUTION 2015-027  
(FPA TRANSFER REQUEST:  
LORAIN COUNTY FPA TO  
THE NEORS D FPA)

RESOLUTION OF THE BOARD OF DIRECTORS  
OF THE  
NORTHEAST OHIO AREAWIDE COORDINATING AGENCY

**WHEREAS**, the Northeast Ohio Areawide Coordinating Agency (NOACA) is the Metropolitan Planning Organization (MPO) for the counties of Cuyahoga, Geauga, Lake, Lorain, and Medina, and the areawide water quality management agency for the same region; and

**WHEREAS**, *Clean Water 2000*, the current update to the NOACA Section 208 Water Quality Management Plan, was adopted by the NOACA Board of Directors, certified by the Governor of Ohio, and approved by the United States Environmental Protection Agency; and

**WHEREAS**, *Clean Water 2000* provides for modifications to wastewater treatment facility planning area (FPA) boundaries, subject to review by the NOACA staff, the NOACA Water Quality Subcommittee, and the NOACA Planning and Programming Committee; and

**WHEREAS**, Lorain County has requested a transfer of 29 parcels totaling 97.19 acres from the Lorain County FPA to the NEORS D FPA for the benefit of regional water quality and economic development; and

**WHEREAS**, The Lorain County Sanitary Engineer, with support from the Columbia Township Trustees, is requesting that the portions of Columbia Township with the current prescription of "sewer plans undeclared" be changed to the prescription of "sewers expected within 20 years"

**WHEREAS**, the NOACA Water Quality Subcommittee, Planning and Programming Committee and Executive Committee reviewed the transfer request and recommended that the Board of Directors approve the FPA boundary changes and declaration of prescriptions.

**NOW, THEREFORE, BE IT RESOLVED** by the Board of Directors of the Northeast Ohio Areawide Coordinating Agency, consisting of forty-five principal officials serving general purpose local governments throughout and within the counties of Cuyahoga, Geauga, Lake, Lorain, and Medina that:

**Section 1.** The Executive Director is authorized to submit the new boundaries to Ohio EPA for certification by the Governor.

**Section 2.** The Executive Director is authorized to transmit certified copies of this resolution to appropriate federal, state, and local agencies.

Certified to be a true copy of a Resolution of the Board of Directors of the Northeast Ohio Areawide Coordinating Agency adopted this 13th day of March 2015.

Secretary: 

Date Signed: 3-13-15