



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W Jackson Blvd
Chicago, IL 60604

Environmental Assessment
of
Ashtabula County for Waterline Extension and Water Tower Construction

June 2, 2025

The U.S. Environmental Protection Agency (EPA) prepared the following Environmental Assessment (EA) for the Waterline Extension and Water Tower Construction (the Proposed Action). EPA prepared this EA in compliance with the National Environmental Policy Act (NEPA) and EPA's procedures for implementing NEPA (40 CFR Part 6). This EA discloses the reasonably foreseeable environmental impacts that may result from the Proposed Action and the alternatives considered. The EA is organized into the following eight sections that document EPA's findings:

- 1) **General Information.** This section includes the name of the Proposed Action, grant identification number, and point of contact information for the grant applicant and responsible EPA official.
- 2) **Proposed Action Description.** This section describes the Proposed Action, implementation timeline, and current environmental conditions within the project area.
- 3) **Environmental Impacts of the Proposed Action.** This section describes the Proposed Action's potential reasonably foreseeable impacts to resources within the project area.
- 4) **Alternatives Considered.** This section describes the alternatives to the Proposed Action, the potential environmental impacts of each, and why each alternative was not identified by EPA as the Proposed Action.
- 5) **Review of Applicable Environmental Laws or Executive Orders.** This section identifies the environmental laws and executive orders applicable to the Proposed Action.
- 6) **Required Mitigation.** This section presents the mitigation measures that are essential to render the impacts of the Proposed Action not significant and/or to avoid non-compliance with applicable environmental laws or executive orders.
- 7) **Individuals and Agencies Consulted.** This section presents a list of the individuals and agencies consulted during the development of the EA.
- 8) **List of Supporting Documents.** This section provides a list and brief description of the supporting documents attached to the EA.

I. General Information		
Proposed Action Name	Program / Funding Authority	Grant ID Number (if known)
Waterline Extension and Water Tower Construction	EPA Community Grants	
Grant Applicant Organization		
Ashtabula County		
Grant Applicant Contact Information		
<i>Name/Title</i>	<i>Email</i>	<i>Phone Number</i>
Douglas G. Starkey/ Environmental Services Director	dgstarkey@ashtabulacounty.us	440-576-3725
EPA Responsible Official		
<i>Name/Title</i>	<i>Email</i>	<i>Phone Number</i>
Carolyn Banks / Project Officer	banks.carolyn@epa.gov	312-886-6530
Prepared By		
<i>Name/Title</i>	<i>Email</i>	<i>Phone Number</i>
N/A	--	--
Direct Comments to (if different from EPA Responsible Official)		
<i>Name/Title</i>	<i>Email</i>	<i>Phone Number</i>

II. Proposed Action Description

Proposed Action Location and Site Description

Provide the address or general location of the Proposed Action (include state, county, and locality) and a brief description of the site characteristics. Examples of site characteristics include land use and zoning, population served by the existing water system, current infrastructure, and formally classified lands within the Proposed Action area.

Ashtabula County is proposing to construct 23,087' of water main in South River, Brandt, and Adkins Road in Ashtabula County, OH (Figure 1), and a water tower at 1904 S Broadway in Ashtabula County OH (Figure 2). The water mains will be within the existing roadway and easements. The water tower will be constructed in a presently vacant lot.

Ashtabula County Public Water System (PWS) serves customers in ten different townships including the following: Ashtabula, Austinburg, Geneva, Harpersfield, Jefferson, Lenox, Morgan, Plymouth, Rome, and Saybrook, as well as the Village of Geneva-on-the-Lake, the City of Geneva, and the Village of Rock Creek. The distribution system consists of over 140 miles of water mains, four elevated water storage tanks, and seven booster stations.



— Water Line Installations

0 1,500 3,000 6,000 Feet

Province of Ontario, Esri Canada, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS, NRCAN, Parks Canada, Maxar

Figure 1. Waterline installation locations.



Figure 2. Water tower location.

Check all land uses that occur within or adjacent to the Proposed Action area:

- | | | | |
|--|--|---|---|
| ☐ Agriculture | ☐ Military | ☐ Private | ☐ Other (specify): _____ |
| ☐ Commercial | ☐ Mixed Use | ☒ Residential | |
| ☐ Forest | ☐ Open Space | ☐ Water | |
| ☒ Industrial | ☐ Park/Recreation | | |

Brief Description of Proposed Action

The project will construct 23,087' of water main in South River, Brandt, and Adkins Road in South River Road in Ashtabula County, OH, and a 177' tall water tower at 1904 S Broadway in Ashtabula County, OH.

Purpose of and Need for Proposed Action

The purpose of the proposed action is to provide residents and business in the project area with a safer and more reliable water supply.

Residents and business in the project area currently rely on poorly performing private wells for their water supply. Extending the water main will provide residents and businesses in the area with a safer water supply. The new water tower will provide redundancy in the water system and ensure water service continues in the event of a system breakdown.

Anticipated Construction Start Date and Duration of Proposed Action

Construction is expected to take 2 years and occur from approximately August 2025 to August 2027.

Affected Environment in the Proposed Action Area

Provide a brief description of the current environmental conditions within the Proposed Action area. Topics discussed may include, but are not limited to, the following: topography, geology, and soils; water resources (surface waters, groundwater, wetlands, floodplains); natural resources (vegetation, wildlife, habitats); cultural resources (historic properties, archeological/tribal resources); air quality; socioeconomics; transportation; energy and utilities; solid/hazardous wastes.

The water tower location consists of a relatively flat, vacant lot that was previously cleared of trees during clearing and grading activities for the development of an adjacent commercial lot. The water main extension will occur in existing roadways. The Project Area does not contain any formally classified lands, such as parks, wilderness areas, state forests, or national forests.

III. Environmental Impact of the Proposed Action

In the tables below, use the following impact categories to document the Proposed Action's impact on the environmental resource:

- **No Impact** (e.g., resource not present)
- **Beneficial Impact Only** (no adverse impact)
- **Adverse Impact, Mitigation Not Required** (e.g., minor and/or temporary impact)
- **Adverse Impact, Mitigation Required** (e.g., to avoid potentially significant impact)

Under each heading, provide a brief description of the impacts on the environmental resource and cite any supporting analyses. Impacts or effects are defined as changes to the human environment from the proposed action or alternatives that are reasonably foreseeable. Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic (such as the effects on employment), social, or health effects. Effects may also include those resulting from actions that may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial.†

III.A. Natural and Cultural Resources

Impact Category	Environmental Resource
No Impact	Groundwater Resources. Effects on groundwater resources located within the Proposed Action area or adjacent properties. Examples include changes in depth or character of the water table, rate of groundwater recharge, and groundwater quality. <u>Summary of Impacts:</u> Project Area is not within a Source Water Protection Area. Impacts possible, but not likely.
No Impact	Surface Water Resources. Effects on surface waters located within the Proposed Action area or adjacent properties. Examples include changes in water quality (e.g., due to erosion, new/modified discharges, increased runoff, or contaminant leaks), hydrology, physical characteristics (e.g., depth), and riparian buffers. <u>Summary of Impacts:</u> The project is not likely to impact surface waters located within the proposed action area. The proposed action will result in an increased amount of water usage from the Ashtabula County Public Water System. Ashtabula County purchases water from Aqua Ohio which supplies Ashtabula County with water from the Aqua Ohio – Ashtabula Water Treatment Facility. This facility draws raw water through two intakes in Lake Erie. The increase in usage is not likely to have significant impact or require a change in water withdrawal permits.
No Impact	Unique Natural Features. Effects on natural features (e.g., caves, cliffs, vistas, canyons, waterfalls, dunes, tree stands, etc.) within the Proposed Action area or adjacent properties. Examples include alteration, destruction, or restriction of access to the natural feature. <u>Summary of Impacts:</u> The project site does not contain natural features such as caves, cliffs, vistas, waterfalls, dunes, or tree stands. The proposed action will not alter, destruct, or restrict access to the natural features.
No Impact	Vegetation and Wildlife. Effects on plant communities, wildlife, and habitats within the Proposed Action area or adjacent properties.

	<u>Summary of Impacts:</u> The Ohio EPA generated a threatened and endangered species report from the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) tool for the water main project area. Species identified include the Indiana Bat (Endangered), Northern long-eared bat (Endangered), Rufa Red Knot (Threatened), Eastern Massasauga (Threatened), Round Hickorynut (Threatened), and Snuffbox Mussel (Endangered). There are no critical habitat within the project area. Given the scope of work, EPA has made a no effects determination for the listed species. The Ohio EPA submitted a review request for this portion of the project to the Ohio Department of Natural Resources (ODNR) for consideration of state listed threatened and endangered species. ODNR responded on 09/20/2024 with the determination that there was no typical habitat for state listed species present in the project area. On 5/19/2025 EPA generated a threatened and endangered species report from the USFWS IPaC tool for the water tower project area. Species identified include the Indiana Bat (Endangered), Northern long-eared bat (Endangered), Rufa Red Knot (Threatend), Eastern Massasauga (Threatend), and Monarch Butterfly (Proposed Threatend). The EPA initiated an informal review with the U.S Fish and Wildlife Service Ohio Field Office on 5/19/2025. The U.S Fish and Wildlife Service Ohio Field Office responded on 5/20/2025 with recommendations for preventing negative impacts to any bats and rattlesnakes on the property. EPA determined that the project will comply with all U.S Fish and Wildlife Service recommendations and likely not impact any of the identified species.
No Impact	Cultural Resources. <i>Effects on historic, cultural, and archeological resources within the Proposed Action area or adjacent properties.</i> <u>Summary of Impacts:</u> On January 24, 2023, the Ohio EPA submitted a letter to the State Historic Preservation Office (SHPO) for the water tower construction area with a determination of no effect. Ohio EPA staff met with the SHPO on February 1, 2023 and submitted additional information to the SHPO on February 7, 2023. On March 7, 2023 the SHPO responded concurring with the Ohio EPA's finding. On April 23, 2025, Ashtabula County initiated consultation with the SHPO for the waterline extension portion of this project. On May 15, 2025, the SHPO responded with a determination of no effect.
III.B. Land Use Planning and Development	
Impact Code	Environmental Resource
Minor Adverse Impact, Mitigation Not Required	Land Use Change and Consistency. <i>Effects on existing pattern and type of land use, including changes within the Proposed Action area or adjacent properties as well as promotion of future development and population growth (e.g., due to new or expanded infrastructure). Consistency with local or regional comprehensive plans, community policies, and land use goals.</i> <u>Summary of Impacts:</u> Minor temporary impacts to land use for the project area located within the roadway. The area where the water tower is located is currently a vacant lot and the land use change will have no significant impacts. The proposed action will comply with land use planning, building permit, and zoning requirements.

No Impact	Open/Recreational Space and Cultural Facilities. <i>Effects on the quality of and access to open space, recreational space, and cultural facilities (e.g., theaters, museums, and libraries) within the community.</i>
	<u>Summary of Impacts:</u> The proposed action would not have any effects on the quality of and access to open space, recreational space, or cultural facilities, such as theaters, museums, or libraries within the community.
No Impact	Topography, Geology, and Soils. <i>Effects on site topography, underlying geology (e.g., bedrock), and soils, as well as the potential for these characteristics to affect the Proposed Action (e.g., unsuitable soil conditions). Examples include changes in grading and fill; site stability, runoff patterns, and erosion potential; bedrock modifications; existing or potential soil contamination; and conversion of soils suitable for agricultural activities.</i>
	<u>Summary of Impacts:</u> The Proposed Action would have no permanent impact on the site topography or underlying geology. The Proposed Action would have minor temporary impacts during construction on soil erosion.
Minor Adverse Impact – Mitigation Not Required	Public Safety and Nuisances. <i>Potential to cause or contribute to hazards and nuisances (e.g., noise, vibration, hazardous materials) within the Proposed Action area or adjacent properties, as well as the potential for these hazards and nuisances to affect the Proposed Action.</i>
	<u>Summary of Impacts:</u> The proposed action would have temporary, localized impacts on noise and vibration in the community. These expected impacts would occur during construction and may be noticeable to nearby receptors. With the implementation of BMPs, such as limiting construction to weekday, daylight hours, impacts are expected to be minor and temporary.
Adverse Impact, Mitigation Not Required	Environmental Design. <i>Effects on the visual coherence, scale, and character of the surrounding natural or manmade environment within the Proposed Action area or adjacent properties.</i>
	<u>Summary of Impacts:</u> The proposed action would have temporary and permanent impacts to the surrounding natural and manmade environment. During the Proposed Action's construction phase, there may be a temporary degradation of the visual coherence and character of the surrounding environment due to presence of construction vehicles and equipment. The addition of the 177' tall water tower will change visual aspects of the environment. The water tower will be in a vacant lot and therefore the visual impacts are expected to be minor.
III.C. Community Services and Infrastructure	
Impact Code	Environmental Resource
No Impact	Essential Community Services. <i>Effects on the quality of and access to community services including schools, health care, social services, and emergency services (police, fire, and emergency medical). Examples include changes in demand for services (e.g., student population growth) and changes in accessibility due to road closures and modifications.</i>
	<u>Summary of Impacts:</u> The proposed action will have no effects on the quality of and access to community services, including schools, health care, social services, and emergency services (police, fire, and emergency medical).

No Impact	Solid and Hazardous Waste Management. <i>Effects on the capacity of and access to solid waste disposal facilities in the community, as well as generation, handling, and disposal of hazardous waste.</i>
	<u>Summary of Impacts:</u> The proposed action will have no effects on the capacity of and access to solid waste disposal facilities in the community, including generation, handling, and disposal of hazardous waste.
No Impact	Wastewater Infrastructure. <i>Effects on the capacity and effectiveness of the sewer or septic system that serves the Proposed Action area.</i>
	<u>Summary of Impacts:</u> The proposed action will not affect the capacity and effectiveness of the sewer or septic system that serves the Proposed Action Area.
No Impact	Storm Water Infrastructure. <i>Effects on the capacity and effectiveness of storm water collection, conveyance, and treatment systems within the Proposed Action area.</i>
	<u>Summary of Impacts:</u> The proposed action will not affect the storm water infrastructure within the community.
Beneficial Impact Only	Water Supply. <i>Effects on the capacity and effectiveness of drinking water systems within the Proposed Action area.</i>
	<u>Summary of Impacts:</u> The proposed action will improve the drinking water system. Completion of the project will provide residents and businesses in the area with a source of safe, reliable, and sufficient potable water.
Adverse Impact, Mitigation Not Required	Energy Use and Infrastructure. <i>Effects on energy use and the capacity and effectiveness of energy infrastructure (e.g., electrical grid, natural gas distribution). Examples include long-term changes in electricity demand and changes in fossil fuel use due to modified commuting patterns.</i>
	<u>Summary of Impacts:</u> Construction activities would result in increased energy consumption to power equipment and to fuel construction vehicles. The new water tower will slightly energy increase consumption.
No Impact	Transportation. <i>Effects on the adequacy of and access to public transportation services within the community.</i>
	<u>Summary of Impacts:</u> The proposed action will not affect the adequacy of or access to the public transportation services within the community.
III.D. Socioeconomics	
Impact Code	Environmental Resource
No Impact	Demographic/Character Changes. <i>Effects on the demographic characteristics of the community, such as population or projected population growth.</i>
	<u>Summary of Impacts:</u> The proposed action will not have effects on the demographic characteristics of the community.
No Impact	Displacement. <i>Effects on the relocation of individuals, families, existing jobs, community facilities, or business establishments.</i>
	<u>Summary of Impacts:</u> There is no displacement or relocation of individuals, families, existing job communities or business establishments anticipated as part of the proposed project.

No Impact	Economic Opportunities and Growth. <i>Effects on employment opportunities and economic growth within the community.</i> <u>Summary of Impacts:</u> The proposed action will not affect economic opportunities and growth within the community.
III.E. Air Quality and Climate	
Impact Code	Environmental Resource
Adverse Impact, Mitigation Not Required	Air Quality and Odor. <i>Effects on community air quality. Examples include temporary construction-related emissions, installation of new emission sources, changes in transportation patterns, and introduction of sources of odor.</i> <u>Summary of Impacts:</u> The proposed action would result in the temporary increase of fugitive dust and equipment exhaust emissions during construction activities. General conformity applicability analysis is not required for this Proposed Action as the emissions are anticipated to be below the de minimis threshold for all criteria pollutants.
No Impact	Climate. <i>Effects on greenhouse gas emissions and resiliency, as well as potential effects of extreme environmental events on the Proposed Action.</i> <u>Summary of Impacts:</u> Construction activities are not expected to result in significant impacts.
III.F. Other Resource Areas	
Impact Code	Environmental Resource
No Impact	Other Resource Areas. <i>Effects on resource areas not reflected in the above categories.</i> <u>Summary of Impacts:</u> The proposed action does not contribute to adverse cumulative impacts on the human environment.

IV. Alternatives Considered

Briefly describe alternatives to the Proposed Action considered including other sites, design modifications, or no action. Summarize the beneficial and adverse impacts on the human environment for each and the reason the alternative was not identified by EPA as the Proposed Action.

Alternative 1: No Action 2: Water main extension and water tower construction

The No Action Alternative would not address the need for system resiliency during disruptions to water service. The No Action Alternative would also not address the issues related to the underperforming private wells residents are currently utilizing. Therefore, the No-Action Alternative is not a reasonable alternative and EPA did not identify the No Action Alternative as the Proposed Action.

Alternative 2 would extend Ashtabula County's distribution system to residents and businesses along a portion of South River Road and add a water tower to increase system resiliency. The addition of elevated water storage in the service area would improve system resiliency by providing a supply of water in the event of a failure of the infrastructure that serves this area and would decrease the likelihood of water main breaks, as the booster station would no longer be pumping into a closed-system. The extension of the distribution system would allow residents and business to stop utilizing the poorly performing private wells.

V. Review of Applicable Environmental Laws and Executive Orders

In the list below, provide the compliance determination for each environmental law or executive order identified as applicable to the Proposed Action.

ID	Environmental Law/Executive Order	Compliance Determination
1	Endangered Species Act [16 U.S.C. §§ 1531–1599]	EPA made a no effect determination for listed species that potentially occur in the project location. There are no critical habitats within the project area.
2	Bald And Golden Eagle Protection Act [16 U.S.C. §§ 668-668C]	This project will not take any part of bald eagles or disturb bald eagle nesting sites. There will be no impact to Bald eagles.
3	Fish and Wildlife Coordination Act [16 U.S.C. §§ 661 et seq.]	The project will not affect fish and wildlife; therefore, the regulations and requirements of this act do not apply.
4	Marine Mammal Protection Act [16 U.S.C. §§ 1361-1407]	The project will not affect marine mammals; therefore, the regulations and requirements of this act do not apply.
5	National Historic Preservation Act (NHPA) as amended [54 U.S.C. §§ 300101 et seq.] and Archeological and Historic Preservation Act, as amended [54 U.S.C. §§ 312501-312508]	There are no historic properties on the NRHP located within the bounds of the project area. The proposed construction activities will be contained within a small footprint of a previously developed/disturbed area, lowering the potential for encountering previously unidentified cultural resources. Should any unidentified archaeological, cultural, or paleontological resources be discovered as a result of construction activity, EPA will require that work that would disturb such resources must be stopped.
6	Archaeological Resources Protection Act [16 U.S.C. §§ 470AA-MM]	Construction will only occur on an existing building site. Therefore, no culturally sensitive items should be disturbed, removed, or discovered. Should archaeological resources or Native American human remains, funerary objects, sacred objects, and cultural items be identified, although not expected to be present, the regulations and requirements of this act will be applied.
7	Native American Graves Protection and Repatriation Act [25 U.S.C. §§ 3001 et seq.]	Construction will only occur on an existing building site. Therefore, no culturally sensitive items should be disturbed, removed, or discovered. Should archaeological resources or Native American human remains, funerary objects, sacred objects, and cultural items be identified, although not expected to be present, the regulations and requirements of this act will be applied.
8	Clean Water Act [Section 404] and Protection of Wetlands [Executive Order No. 11990 (1977), as amended by Executive Order No. 12608 (1997)]	There are no known wetlands, waters of the United States, or Section 10 waters within the proposed project area.
9	Rivers and Harbors Act [Section 10]	There are no Section 10 waters in the project area.

10	Flood Plain Management [Executive Order No. 11988 (1977), as amended by Executive Order No. 12148 (1979)]	Portions of the project occur near a 100-year floodplain. The project is within roadways, hardscapes, and developed area; it will not add any new or additional structures to the floodplain. While the project involves construction, ground disturbing or excavation activities will be minimal, and the area near the floodplain will be returned to pre-construction conditions. Based on these considerations, the proposed project is not anticipated to result in a negative impact to the natural and beneficial floodplain values. Therefore, the project is anticipated to conform to this executive order.
11	Safe Drinking Water Act [42 U.S.C. §§ 300F-300J-26]	No sole source aquifers exist at or near the Project location; therefore, the regulations and requirements of this act do not apply.
12	Farmland Protection Policy Act [7 U.S.C. §§ 4201-4209]	The project activities would not unnecessarily or irreversibly convert farmland to nonagricultural uses. The ground disturbance will occur on land that has been developed.
13	Coastal Zone Management Act [16 U.S.C. §§ 1451-1466]	The project is not located within the coastal zone; therefore, the regulations and requirements of this act do not apply.
14	Coastal Barriers Resources Act [16 U.S.C. §§ 3501-3510]	This project is not located within any coastal barriers. Therefore, the project would not conflict with the Coastal Barrier Resources Act.
15	Wild and Scenic Rivers Act [16 U.S.C. §§ 1271-1287]	There are no Wild and Scenic Rivers within the project area; therefore, the regulations and requirements of this act do not apply.
16	Essential Fish Habitat Consultation Process Under the Magnuson-Stevens Fishery Conservation and Management Act [16 U.S.C. §§ 1801-1891]	The project is not located within essential fish habitat. Therefore, the regulations and requirements of this act do not apply.
17	Migratory Bird Treaty Act [16 U.S.C. §§ 703-712]	The project does not involve the taking, killing, possession, transportation, or importation of migratory birds, their eggs, parts, or nests. Therefore, this project would not be in conflict with this act.
18	Clean Air Act Conformity [42 U.S.C. § 7506(C)]	The project is located in a nonattainment or maintenance area for Ozone. Potential emissions may occur during project construction, though this will be temporary in nature and potential impacts will be minimized through best management practices.
19	Wilderness Act [16 U.S.C. §§ 1131 et seq.]	The project is not located in or near any Wilderness areas; therefore, the regulations and requirements of this Act do not apply.

VI. Required Mitigation Measures

Describe any mitigation measures that are essential to render the impacts of the Proposed Action not significant and/or to avoid non-compliance with applicable environmental laws or executive orders. Use the environmental resource areas listed in Section III to identify the resource area of concern. If no mitigation measures are required, type "N/A".

Environmental Resource Area	Mitigation
Vegetation and Wildlife	Ashtabula County will comply with U.S Fish and Wildlife recommendations to mitigate any potential impacts to bat and rattlesnake species in the area.

VII. Agencies and Persons Consulted

Provide a list of individuals, tribes, Federal, State, and local agencies consulted during the development of this EA. Provide the name, title, and agency of the individuals consulted.

Ohio Historic Preservation Office

Ohio Department of Natural Resources

United States Fish and Wildlife Service Ohio Field Office

Ohio Environmental Protection Agency

VIII. List of Supporting Documents

Provide a list and brief description of the supporting documents attached to this EA.

USFWS IPaC Report

NEPAAssit Report

Ohio SHPO Concurrence Letter

Ohio EPA Preliminary FONSI for Ashtabula County South River Road Water Line Extension

Ohio EPA Preliminary FONSI for Ashtabula County Water Tower