



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

**December 6, 2021**

**Limited Environmental Review and Finding of No Significant Impact**

**Western Reserve Land Conservancy – Lake County  
Whittlesey Beach Ridge Preserve Project  
WRRSP loan number: WR391499-0015**

**Sponsor: Northeast Ohio Regional Sewer District Shoreline Consolidation Sewer Project  
Sponsoring loan number: CS391430-0204**

The attached Limited Environmental Review (LER) is for a nonpoint source project in Lake 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 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 qualifies 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, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

*Jonathan Bernstein*

Jonathan Bernstein, Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

WRRSP Project:	Whittlesey Beach Ridge Preserve Project
WRRSP Applicant:	Western Reserve Land Conservancy
WRRSP Loan:	WR391499-0015
Sponsoring Community:	Northeast Ohio Regional Sewer District
Sponsoring Project:	Shoreline Storage Tunnel (SST) Project
Sponsoring WPCLF Loan:	CS391430-0198

### **Project Summary**

Western Reserve Land Conservancy (WRLC) seeks \$2,560,500 in funding through Ohio EPA's Water Resource Restoration Sponsor Program (WRRSP) to protect the Whittlesey Beach Ridge Preserve protection project by purchasing the entirety of three parcels and portions of ten parcels to combine them for a 78.3-acre project area located in northern Lake County, in the City of Mentor and Village of Kirtland Hills (Figure 1 and Figure 2). The combined parcels include 35.1 acres of high-quality Category 3 wetland, 2,769 linear feet of Class III headwater tributaries to Ward Creek, which is a tributary to the Chagrin River, and 43.2 acres of upland habitat that contains extremely rare old growth forest.

Northeast Ohio Regional Sewer District (NEORS) 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 Whittlesey Beach Ridge Preserve project will be provided by advancing a portion of the interest to be paid by NEORS on its Shoreline Storage Tunnel (SST) project. This project is scheduled to be awarded WPCLF funding in January 2022. By voluntarily agreeing to sponsor the Whittlesey Beach Ridge Preserve project, NEORS 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 the 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 three parcels and portions of ten parcels that make up the 78.3-acre project site are in the City of Mentor and Village of Kirtland Hills in northern Lake County in the Willoughby-Chagrin River watershed. The project site is almost entirely forested with predominately old-growth forest: it

contains 35.1 acres of high-quality wetlands, as well as 2,769.8 linear feet of Class III headwater streams that flow into Ward Creek, which is a tributary to the Chagrin River. The Chagrin River watershed is 265 square miles. The watershed is included in Ohio EPA's 303(d) Impaired Waters List due to habitat degradation from land development/urbanization, organic enrichment, nutrients, flow alteration, wetlands filling and removal of riparian vegetation. And while the Chagrin River in this portion of the watershed is in full attainment of aquatic life use monitoring goals per Ohio EPA's 2020 Integrated Water Quality Report, Ward Creek is in non-attainment. Therefore, it is critical to protect the water quality of the Chagrin River by protecting and improving the water quality of its tributaries, including the 2,700 linear feet of forested tributaries on Whittlesey Beach Ridge Preserve.

Whittlesey Beach Ridge is a geologic feature created by glacial advances and retreats approximately 14,000 years ago. The beach ridge found on the project site is the edge of the ancient Lake Whittlesey, a proglacial lake that is an ancestor of present-day Lake Erie. The Whittlesey Beach Ridge Preserve site contains three trees that are among the top five largest of their species in the state. Two tulip trees were identified as the 4<sup>th</sup> and 5<sup>th</sup> largest, and a sugar maple was identified as the 5<sup>th</sup> largest. There is also a green ash of notable size (58-inch diameter at breast height) present on the site which will be treated to protect against boring insects.

The project site also serves as habitat for 39 species of lichen, two state-endangered species of bats, six state-listed species of bats and eleven state-listed species of birds. Bird surveys on the site identified 79 different species of birds. Of those, 18 ranked among medium-to-highest priority for the Bird Conservation Region in which the project is located.

### **Project Description**

Western Reserve Land Conservancy will acquire and permanently protect by placing an Environmental Covenant on 78.3 acres of high quality, highly developable old-growth forest that contains three trees listed as the top five largest in Ohio; habitat that supports two state-endangered bat species; five state Species of Concern (bat and bird); a species of lichen identified as "new to Ohio;" 35.1 acres of interspersed Category 3 wetlands and 2,769.8 linear feet of Class III headwater streams that flow into Ward Creek. WRLC will conduct invasive vegetation management program within the wetland areas and a two-year treatment for emerald ash borers on a 58-inch diameter green ash tree (*Fraxinus pennsylvanica*).

### **Property Management and Maintenance**

The property will be managed as a passive-use park. The site will be accessible to the public on a permission-only basis for passive recreation, research, and educational use. 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 for the purpose of protecting or improving 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 EA and authorized by the Owner, hunting and trapping may be permitted in order 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 Western Reserve's Whittlesey Beach Ridge Preserve project will be made possible through Northeast Ohio Regional Sewer District's Shoreline Consolidation Sewer project WPCLF loan award, which is scheduled for January 2022.

### **Public Participation**

Western Reserve Land Conservancy staff members will carry out public-awareness and educational outreach elements resulting from the Whittlesey Beach Ridge Preserve project. WRLC has been involved in several City of Mentor public meetings (occurring between fall 2019 and summer 2020) regarding conservation of the property. WRLC will publicize the project by issuing press releases regarding the WRRSP award and the acquisition and preservation of the Whittlesey Beach Ridge Preserve project. WRLC sends a monthly e-newsletter to approximately 7,751 subscribers and

actively employs social media outlets including Facebook (4,277 followers); Twitter (1,640 followers); Linked-In (878 followers); and Instagram (1,610 followers). WRLC will also use newsletters and their main website ([www.wrlandconservancy.org](http://www.wrlandconservancy.org)) to inform the public that a new natural space is being protected as a result of WRRSP funding, and to educate the public about the importance of water resource protection throughout the Chagrin River Watershed.

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:

<https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>.

### **Conclusion**

Ohio EPA conducts environmental reviews of all projects prior to awarding WPCLF financing. The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is a water quality protection project consisting of non-structural practices. 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 to 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. In fact, the proposed project will have beneficial environmental impacts by preserving high quality wetland, headwater stream and old-growth forest habitat.

**Will have no effect on high-value environmental resources** since it will protect the quality of headwater tributaries to Ward Creek, a tributary to the Chagrin River by permanently protecting the streams, associated wetlands, and 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 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.

### **Contact info**

Rose McLean, Environmental Planner  
Water Resource Restoration Sponsor Program, Ohio EPA, DEFA  
P.O. Box 1049, Columbus, Ohio 43216-1049  
[Rose.McLean@epa.ohio.gov](mailto:Rose.McLean@epa.ohio.gov)

Figure 1. Whittlesey Beach Ridge Preserve Location

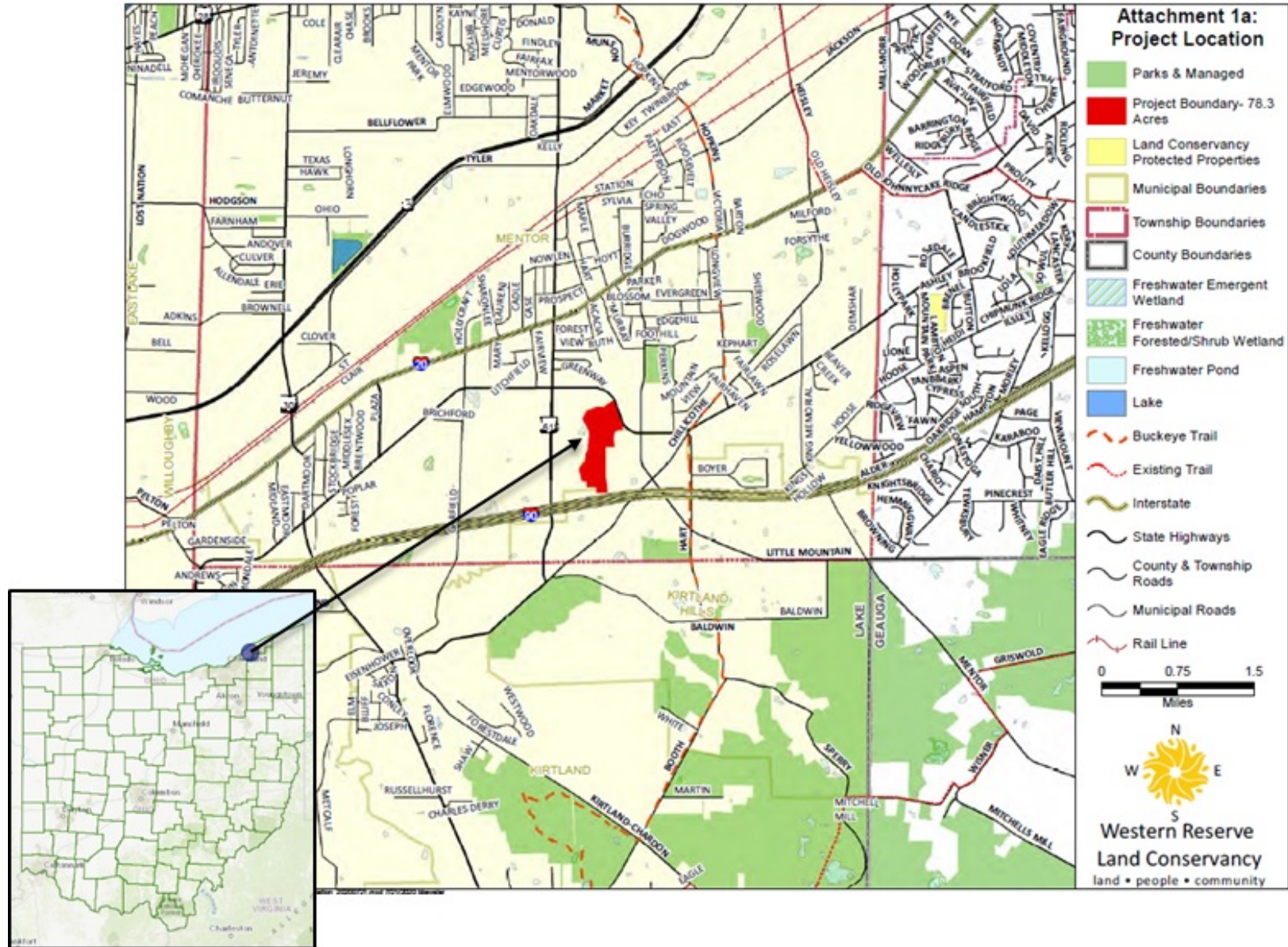


Figure 2. Property water resources – Whittlesey Beach Ridge Preserve Project

