



# State Revolving Fund Loan Programs

## Drinking Water, Wastewater, Nonpoint Source

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### APPENDED

### ENVIRONMENTAL ASSESSMENT

### AND

### FINDING OF NO SIGNIFICANT IMPACT

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#### CITY OF GOSHEN

Goshen River Race Remediation Project – Site 3  
STATE REVOLVING FUND PROJECT WW 09072002

**DATE: November 12, 2010**

**TARGET PROJECT APPROVAL DATE: December 15, 2010**

#### I. INTRODUCTION

The above entity has applied to the Waste Water State Revolving Fund (WWSRF) Loan Program for a loan to finance all or part of the waste water project described in the accompanying Environmental Assessment (EA). As part of facilities planning requirements, an environmental review has been completed which addresses the project's impacts on the natural and human environment. This review is summarized in the attached EA, which can also be viewed at <http://www.in.gov/ifa/srf/>.

#### II. PRELIMINARY FINDING OF NO SIGNIFICANT IMPACT (FNSI)

The WWSRF has evaluated all pertinent environmental information regarding the proposed project and determined that an Environmental Impact Statement is not necessary. Subject to responses received during the 30-day public comment period, and pursuant to Indiana Code 4-4-11, it is our preliminary finding that the construction and operation of the proposed facilities will result in no significant adverse environmental impact. In the absence of significant comments, the attached EA shall serve as the final environmental document.

#### III. COMMENTS

All interested parties may comment upon the EA/FNSI. Comments must be received at the address below by the deadline date above. Significant comments may prompt a reevaluation of the preliminary FNSI; if appropriate, a new FNSI will be issued for another 30-day public comment period. A final decision to proceed, or not to proceed, with the proposed project shall be effected by finalizing, or not finalizing, the FNSI as appropriate. Comments regarding this document should be sent within 30 days to:

**Sarah Hudson**  
**Senior Environmental Manager**  
**State Revolving Fund**  
**100 N. Senate Ave. IGCN 1275**  
**Indianapolis, IN 46204**  
**317-232-8663; [sahudson@ifa.in.gov](mailto:sahudson@ifa.in.gov)**

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**ENVIRONMENTAL  
ASSESSMENT**

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**I. PROJECT IDENTIFICATION**

Project Name and Address: River Race Remediation Project – Site 3  
City of Goshen  
2003 Renfroe Way Suite 1  
Goshen, IN 46528

SRF Project Number: WW 090720 02

Authorized Representative: The Honorable Allan J. Kauffman, Mayor

**II. BACKGROUND**

The City of Goshen will undertake a redevelopment project along the Millrace Canal in downtown Goshen, which will include remediation work. Remediation is necessary because due to a long history of commercial and industrial operations in the vicinity, the area contains contaminated soil and/or groundwater.

Initially, the proposed remediation project was to be funded by the State Revolving Fund (SRF) Loan Program, and SRF solicited comments about the project from the public and environmental review authorities via an Environmental Assessment/Finding of No Significant Impact dated December 9, 2009. The SRF's initial finding pursuant to Section 106 of the National Historic Preservation Act was: "*no adverse effect.*"

As a result of the feedback provided by the environmental review authorities, Sites 1, 2, 5, 6, and 9 were cleared for approval by SRF. Comments from the environmental review authorities are summarized in Section VII of this document. Specifically, it was determined that the work at Site 3 (the removal of a contributing historic property in order to remediate contaminated soil and groundwater) would cause an adverse effect.

Around that time, the funding sources for the individual sites were finalized: while the SRF Loan Program would fund the work at sites 1, 2, 5, 6, and 9, the work at Site 3 would be funded by Brownfields Revolving Loan Fund monies from the U.S. Environmental Protection Agency (US EPA). Site 4 was removed from the project completely.

With the US EPA now funding Site 3 and acting as the lead agency, the US EPA, the Indiana Department of Natural Resources (IDNR) - Division of Historic Preservation and Archaeology (DHPA)/State Historic Preservation Officer (SHPO), and Goshen negotiated mitigation measures and entered into a Memorandum of Agreement (MOA). The Indiana Brownfields Program signed the MOA as a concurring party.

The purpose of this document is to summarize the comments received by the environmental review authorities.

**III. PROJECT LOCATION**

The proposed project is located within the corporate limits of the city of Goshen in Elkhart County, in the USGS Goshen quadrangle, township 36N, range 6E, sections 9, 15, 16, Elkhart civil township. More specifically, the River Race projects (Sites 1, 2, 3, 5, 6 and 9) are located on both sides of the

Hydraulic Canal (“Millrace Canal”), south of Lincoln Avenue and north of Monroe Street. See Figure 1.

#### **IV. PROJECT NEED AND PURPOSE**

Goshen plans to undertake remediation work at the following Sites: River Race (Sites 1, 2, 3, 5, 6 and 9). While the redevelopment plan for the River Race Redevelopment Area has not been finalized, there is a consensus for the area to be a mixed-use residential and commercial development that will expand the city’s downtown area and also add value to a residential neighborhood.

The following sites have soil and/or ground water contamination from commercial and industrial operations in the vicinity. Remediation work (primarily soil excavation) will return the sites to appropriately safe areas.

1. Site 1- NIPSCO Property (315 W. Washington St)
2. Site 2 - Former Jack Wait Property (214 W. Jefferson St.)
3. Site 3 - Former Weaver Property (212 W. Madison)
4. Site 5 - Former Graber Property (409 S. Canal St.)
5. Site 6 - Former Hawkins Property (211 W. Monroe St.)
6. Site 9 - Goshen Street Department (311 W. Madison St.)

#### **V. ESTIMATED PROJECT COSTS, AFFORDABILITY AND FUNDING**

##### Estimated Project Costs

Site 1 NIPSCO Property	\$200,000
Waste Characterization and Landfill Coordination;	
Development of a Site-Specific Health and Safety Plan;	
Initial Property Survey;	
Permit Review;	
Decommissioning of Groundwater Monitoring Wells;	
Soil Excavation;	
Soil Confirmatory Sampling;	
Backfilling and Limited Grading; and	
Remediation Documentation Report.	
Site 2 Former Jack Wait Property	\$400,000
Waste Characterization and Landfill Coordination;	
Development of a Site-Specific Health and Safety Plan;	
Initial Property Survey;	
Permit Review;	
Decommissioning of Groundwater Monitoring Wells;	
Soil Excavation;	
Soil Confirmatory Sampling;	
Backfilling and Limited Grading; and	
Groundwater Injections, as appropriate.	

<p>Sites 3, 5, 6 (Former Weaver and Graber &amp; Hawkins Properties)</p> <p>Waste Characterization and Landfill Coordination;  Development of a Site-Specific Health and Safety Plan;  Initial Property Survey;  Permit Review;  Decommissioning of Groundwater Monitoring Wells;  Soil Excavation;  Soil Confirmatory Sampling;  Backfilling and Limited Grading; and  Remediation Documentation Report.</p>	<p>\$200,000</p>
<p>Site 9 Goshen Street Department</p> <p>Initial Property Survey;  Development of an Erosion Control Plan, and Health and Safety Plan;  Soil Disposal Landfill Coordination;  Soil Excavation;  Limited Grading; and  Soil confirmatory Sampling.</p>	<p>\$100,000</p>
<p><b>Total Estimated Project Cost</b></p>	<p><b>\$900,000</b></p>

Monitoring activities and operation & maintenance costs are not eligible for SRF assistance.

Goshen will amend its previously-approved Clean Water State Revolving Fund (CWSRF) Loan Program preliminary engineering report (PER) to include these projects. Goshen will finance a portion of the Site Remediation project with a 20-year loan of approximately \$900,000 from the State Revolving Fund Loan Program (SRF) at an annual interest rate to be determined at the loan closing. Monthly user rates and charges may need to be analyzed to determine if adjustments are required for loan repayment.

**VI. DESCRIPTION OF EVALUATED ALTERNATIVES**

**No action:** Unless contaminated historic fill materials are removed, metals, and VOC impacts will remain at the Sites, and therefore will pose a continuing risk unless effectively remediated. Groundwater impacts will likely attenuate in approximately 5-10 years. However during that time they will remain a risk to human health and the environment.

**Selected Alternative:** As described above, the selected remedial approach for this project is excavation and disposal of contaminated soils. When groundwater contamination is present, the approach will use chemical oxidation or enhanced reductive biodegradation treatment methods. Contaminated soils may be capped where removal is not feasible or where capping is less expensive while still meeting the long-term use requirements for the Site.

**VII. ENVIRONMENTAL IMPACTS OF THE FEASIBLE ALTERNATIVES**

**Disturbed Land:** All project activities will take place on land which has been significantly disturbed and contaminated by construction and industrial activities, as described above.

**Structural Resources:** The River Race project is located along the Hydraulic (“Millrace”) Canal within the Goshen Historic District’s western edge (Figure 8).

Site 1 NIPSCO Property (315 W. Washington St)

The building on Site 1 may be razed concurrently with excavation of lead and arsenic contaminated fill materials at the Site. Neither the Site nor the building are listed in the Elkhart County Interim Report and therefore are unlikely to be eligible for listing on the National Register of Historic Places.

Site 2 Former Jack Wait Property (214 W. Jefferson St.)

The building on West Subparcel of Site 2 may be razed concurrently with the excavation of contaminated fill materials at the Site. Neither the West Subparcel of Site 2 nor the building on the West Subparcel are listed in the Elkhart County Interim Report and therefore are unlikely to be eligible for listing on the National Register of Historic Places.

The building on East subparcel is listed in the Elkhart County Interim Report: address, 214 West Jefferson; inventory no. 039-543-51144; description, industrial building; rating, "Contributing". The building used to be separate structures but now is connected and considered a single building. Goshen has indicated that the building on the East Subparcel of Site 2 may be redeveloped for mixed residential/limited commercial use. Goshen is currently evaluating the structural integrity of the structure to allow for future reuse planning. The building on the East Subparcel of Site 2 will not be affected by remediation activities.

Site 3 Former Weaver Property (212 W. Madison)

Goshen has indicated that the multi-family residential building and outbuilding on Site 3 may be razed concurrently with the excavation of contaminated fill materials at the Site.

The multi-family residential dwelling and outbuilding at Site 3 is listed in the Elkhart County Interim Report: address, 212 West Madison (same for both); inventory nos. 039-243-51175 and 039-243-51176; description, carriage house and house. Both sites are rated as "Contributing," which indicates the property is not important enough to stand on its own as "Outstanding" or "Notable", but may appear on the National Register as part of the Goshen Historic District.

Site 5 Former Graber Property (409 S. Canal St.)

Goshen has indicated that the building on Site 5 may be razed concurrently with the excavation of contaminated fill materials at the Site. The building is listed in the Elkhart County Interim Report: address, West Monroe Street; inventory no. 039-243-51191; description, garage. The site is rated as "Not Contributing", which indicates the property is not eligible for the National Register.

Site 6 Former Hawkins Property (211 W. Monroe St.)

The Elkhart County Interim Report contains two sites at this address which no longer exist: address, West Monroe Street and Hydraulic Canal; inventory no. 039-243-51258 and 039-243-51205; description, garage and parking lot; rating "Not Contributing" (same for both).

Site 9 Goshen Street Department (311 W. Madison St.)

Goshen has indicated that the buildings currently occupied by the Goshen Street Department (Site 9) will be razed during the project. Neither the Site nor the buildings are listed in the Elkhart County Interim Report and therefore are unlikely to be eligible for listing on the National Register of Historic Places.

Bridges, Parking lots, and Other Historic Landscape Features

The Madison Street Bridge is listed in the Elkhart County Interim Report: address, West Madison Street; inventory no. 039-243-51158; description, bridge; rating "Not Contributing." Activities conducted as part of this project are not expected to degrade the Madison Street Bridge.

The Jefferson Street Bridge is listed in the Elkhart County Interim Report: address, West Jefferson Street; inventory no. 039-243-51124; description Old Stone Bridge; rating “Notable”. Activities conducted as part of this project are not expected to degrade the Jefferson Street Bridge.

According to IDNR-DHPA, the Millrace Canal itself may be eligible for listing on the National Register of Historic Places but is not expected to be affected by this project. No other nearby or adjacent historic bridges, parking lots, or vacant lots are likely to be used or degraded as part of this project.

SRF’s Finding:

In addition to the Elkhart County Interim Report, the internet sites on the website of the IDNR-DHPA were also checked. As previously stated, several sites are part of the Goshen Historic District and are listed in the Elkhart County Interim Report. The Goshen Historic District is listed on both the Indiana Register of Historic Sites and Structures and the National Register of Historic Places.

For Sites 1, 2, 4, 5, 6 and 9, the SRF’s finding pursuant to Section 106 of the National Historic Preservation Act is: “*no adverse effect.*”

For Site 3, the SRF’s finding pursuant to Section 106 of the National Historic Preservation Act is: “*adverse effect.*”

**Wetlands:** A wetland delineation concluded that the project would not affect wetlands.

**Surface Waters:** The River Race project will occur along both sides of the Hydraulic (“Millrace”) Canal but the project will likely not impact the Canal. As noted in the Mitigation Measures below, storm water erosion and sediment control measures will be used to minimize sediment transport to the Canal. The project will not adversely affect waters of high quality listed in 327 IAC 2-1-2(3), exceptional use streams listed in 327 IAC 2-1-11(b), Natural, Scenic and Recreational Rivers and Streams listed in 312 IAC 7-(2), Salmonid Streams listed in (327 IAC 2-1.5-5(a)(3), or waters on the Outstanding Rivers list (Natural Resources Commission Non-rule Policy Document).

**Floodplain:** Part of the project will occur in the 100-year floodplain. Clean fill will be placed in the floodplain. Specifically, fill material will be placed in continuous layers of up to two feet in thickness and compacted with a vibrating compactor.

**Groundwater:** Groundwater will likely not be adversely affected by construction of these projects. Dewatering is unlikely but prior to the initiation of earthmoving activities, the city’s Engineering Department will develop a Rule 5 Erosion Control Plan and apply for a permit. The permit will likely require the installation and maintenance of silt fencing, gravel tracking pad, or other appropriate best management practices to minimize sediment transport to surface water.

The St. Joseph Sole Source Aquifer is unlikely to be negatively impacted by the project.

**Plants and Animals:** Tree removal is not anticipated at Sites 2, 3, 5, 6, and 9. A few trees will be removed on the western portion of Site 1. The construction and operation of the project will not negatively impact state or federal-listed endangered species or their habitat. The project will be implemented to minimize impact to non-endangered species and their habitat.

**Prime Farmland:** The project will not cause conversion of prime farmland.

**Air Quality:** Construction activities may generate some noise, fumes and dust. Construction activities should not impact ozone, airborne pollutants or other air quality concerns.

**Open Space and Recreational Opportunities:** The proposed project may create open space and recreation opportunities.

**Lake Michigan Coastal Program:** The proposed project is not located within the Lake Michigan Coastal Zone.

**National Natural Landmarks:** Construction and operation of the proposed project will not impact National Natural Landmarks.

**Indirect Impacts:**

The city's PER states: *the city will ensure, through local zoning laws or other means, that future development, as well as future collection system or treatment works projects connecting to SRF-funded facilities, will not adversely impact wetlands, archaeological/historical/structural resources, or other sensitive environmental resources. The town will require new development and treatment works projects to be constructed within the guidelines of the U.S. Fish and Wildlife Service, IDNR, IDEM, and other environmental review authorities.*

**Mitigation Measures:**

Prior to the initiation of earthmoving activities, the city of Goshen Engineering Department will develop a Rule 5 Erosion Control Plan and apply for a permit. The permit will likely require the installation and maintenance of silt fencing, gravel tracking pad, or other appropriate best management practices to minimize sediment transport to surface water. In addition, prior to the demolition of all buildings, a pre-demolition survey will be conducted to identify any potential hazards associated with razing the building, such as lead based paint, asbestos, and/or chemical storage. Mitigation measures cited in comment letters from the Indiana Department of Natural Resources and the U. S. Fish and Wildlife Service will be implemented.

**Comments from the Environmental Review Authorities:**

In correspondence dated April 8, 2009, the Natural Resources Conservation Service stated that the project *will not cause a conversion of prime farmland.*

In correspondence dated December 10, 2009, the U.S. Environmental Protection Agency – Ground Water and Drinking Water Branch stated that *the projects do not pose a substantial threat to the St. Joseph Sole Source Aquifer System.*

U.S. Fish and Wildlife Service provided the following comments on January 6, 2010: *the proposed project is within the range of the Federally endangered Indiana bat (Myotis sodalis) and the candidate eastern massasauga rattlesnake (Sistrurus catenatus catenatus). There may be habitat for the Indiana bat within the wooded floodplain of the Elkhart River adjacent to the proposed project area, but there is no suitable habitat for this species or the eastern massasauga in the immediate project impact area; therefore, we agree that the proposed project is not likely to adversely affect these endangered and candidate species.*

Indiana Department of Natural Resources (IDNR) Environmental Unit provided the following comments on January 21, 2010: *this proposal will require the formal approval for construction in a floodway under the Flood Control Act, IC 14-28-1. Please submit a copy of this letter with the permit application.*

*The Natural Heritage Program's data have been checked. To date, no plant or animal species listed as state or federally threatened, endangered, or rare have been reported to occur in the project vicinity.*

*Due to the presence or potential presence of wetlands on site, we recommend contacting and coordinating with the Indiana Department of Environmental Management (IDEM) 401 program and also the United States Army Corps of Engineers (USACOE) 404 program. If wetland mitigation is required, mitigation requirements may be coordinated among all three agencies.*

*Properly dispose of contaminated fill material such that it does not re-enter the environment. Ensure the excavated material is completely removed from the floodway.*

*Fish, wildlife, and botanical resource losses as a result of this project can be minimized through implementation of the following measures.*

*Revegetate all bare and disturbed areas with a mixture of grasses (excluding all varieties of tall fescue), legumes, and native shrub and hardwood tree species as soon as possible upon completion.*

*Do not cut any trees suitable for Indiana bat roosting (greater than 3 inches dbh, living or dead, with loose hanging bark) from April 1 through September 30.*

*Appropriately designed measures for controlling erosion and sediment must be implemented to prevent sediment from entering the stream or leaving the construction site; maintain these measures until construction is complete and all disturbed areas are stabilized.*

*Plant five trees, at least 2 inches in diameter-at-breast height, for each tree which is removed that is ten inches or greater in diameter-at-breast height.*

Pertaining to Sites 1, 2, 5, 6, and 9, the IDNR-DHPA provided the following comments on June 22, 2010: *we concur with the Indiana Finance Authority's June 7, 2010 finding that there are no historic buildings, structures, districts, objects, or archaeological resources within the area of potential effects that will be affected by the above indicated project.*

Pertaining to Site 3, the IDNR- DHPA provided the following comments on June 2, 2010: *we believe that the proposed project, which includes the removal of the house and outbuilding at 212 W. Madison Street (Site #039-243-51176) would result in an adverse effect on the Goshen Historic District.*

On September 24, 2010, the US EPA, the IDNR- DHPA/SHPO, and Goshen entered into a MOA, a copy of which, including mitigation measures, is attached. The Advisory Council of Historic Preservation, the Elkhart County Historical Society, and the Northern Regional Office of the Historic Landmarks Foundation of Indiana were consulted on this project.

### **VIII. PUBLIC PARTICIPATION**

A public hearing was held December 8, 2009 at 4pm in the Council Chambers, Police and Courts Building, 111 East Jefferson Street, Goshen, Indiana to discuss the project.




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DSGN: RED	CHK:
DR: RED	APVD:
PATH:  Projects: Goshen, City of Map Documents: Report Figures: Floodplains	

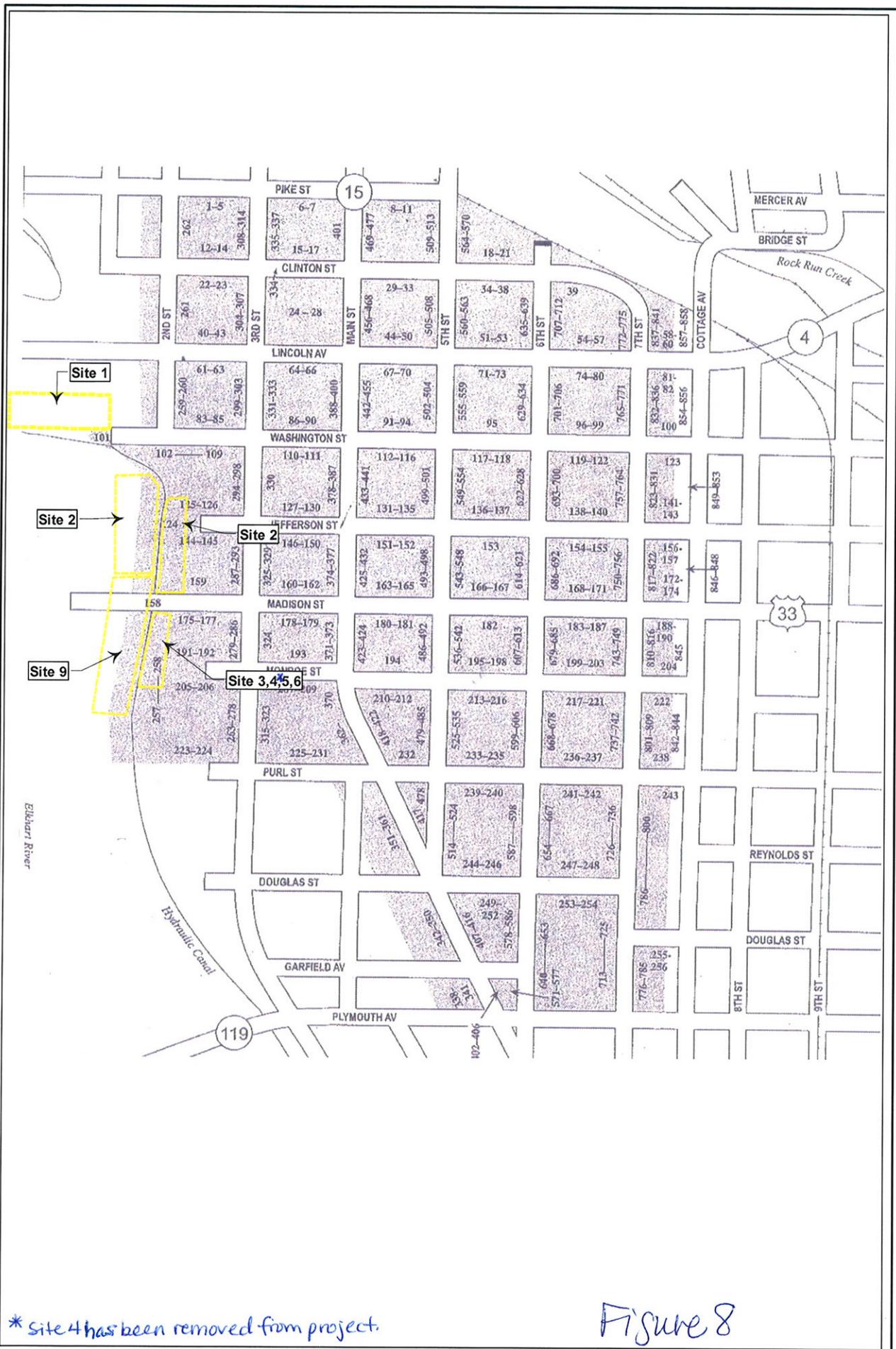
CITY OF GOSHEN  
 USEPA BROWNFIELDS ASSESSMENT  
 GRANT IMPLEMENTATION PROJECT  
 RIVER RACE REDEVELOPMENT AREA

Location of Current 100yr Flood Lines  
 River Race Redevelopment Area  
 Goshen, Indiana

SCALE	1 inch = 150 feet
DWG	Figure 1
DATE	NOV 2009
PROJ NO.	W993573

*\* site 4 has been removed from project*

*Figure 1*



\* Site 4 has been removed from project.

Figure 8

Approximate location of Goshen River Race  
 (Sites 1, 2, 3, 4, 5, 6, and 9) on the  
 Elkhart County Interim Report Map