



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

July 13, 2022

**Preliminary Finding of No Significant Impact
To All Interested Citizens, Organizations, and Government Agencies**

**Trumbull County
State Road Phase 2 Sanitary Sewer Improvements
Loan Number: CS390079-0049**

The attached Environmental Assessment (EA) is for a sewer infrastructure improvement project in Trumbull County which the Ohio Environmental Protection Agency intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The EA describes the project, its costs, and expected environmental benefits. We would appreciate receiving any comments you may have on the project. Making available this EA and seeking your comments 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 WPCLF program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. More information can be obtained by contacting the person named at the end of the attached EA.

Any comments on our preliminary determination should be sent to the email address of the contact named at the end of the EA. We will not act on this project for 30 calendar days from the date of this notice. In the absence of substantive comments during this period, our preliminary decision will become final. After that, Trumbull County can then proceed with its application for the WPCLF loan.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Courtright". The signature is written in a cursive, flowing style.

Kathleen Courtright, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

Project Identification

Project: State Road Sanitary Sewer Improvements Phase 2

Applicant: Trumbull County
160 High Street NW
Warren, OH 44481

Loan Number: CS390079-0049

Project Summary

The county's proposed \$1.4 million project consists of installing approximately 4,600 linear feet of sanitary sewer main and associated manholes to serve roughly 35 buildings in western Champion Township. In addition to the sanitary sewer pipe, the project includes about 1,600 feet of sanitary sewer laterals to the edge of the public rights-of-way. The purpose of the proposed project is to eliminate privately-owned household sewage treatment systems (HSTS) and convey the collected wastewater to the City of Warren's wastewater treatment plant (WWTP). To finance the proposed project, the county expects to borrow as much as \$1.1 million from Ohio EPA's Water Pollution Control Loan Fund (WPCLF) at 0% and repay its WPCLF loan over thirty years. Two sources of grant funding are expected to cover the balance and reduce how much the county needs to borrow from the WPCLF.

In terms of potential direct environmental impacts, Ohio EPA has reviewed the county's proposed sanitary sewer project and determined there will be no significant adverse environmental impacts, as discussed in the conclusion. Any indirect impacts associated with the project's potential to serve other areas through future sewer extensions are covered in the environmental impacts section of this document.

History & Existing Conditions

Property owners initiated this project when they petitioned the county commissioners for wastewater service in May 2014. Subsequently, the county health department issued findings in 2019 that the HSTS in the project area constituted a public health nuisance. The health department drew this conclusion because they found that the HSTS were discharging wastewater flows containing excessive bacteria off-lot. This led to the county applying for an Ohio EPA WPCLF loan for the proposed project.

According to the county, the existing sanitary sewers adjacent to the project area are sized with more than enough capacity to handle the wastewater flows from the project location shown in Figure 1 and to convey the flow to the Warren WWTP for treatment and eventual discharge to the Mahoning River. In this regard, the proposed project is consistent with the areawide water quality plan and wastewater treatment plan for this part of Trumbull County as revised in 2021.

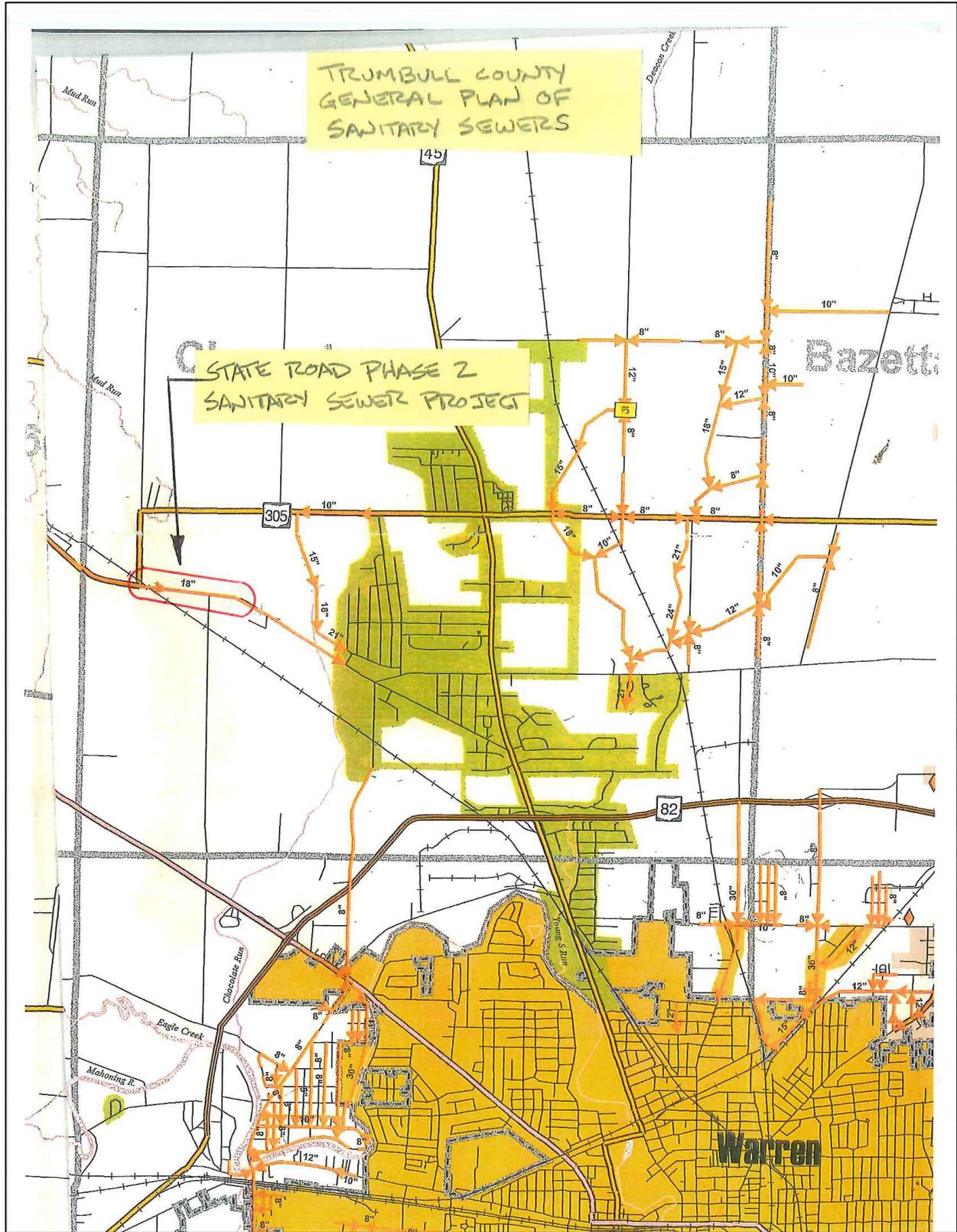


Figure 1. Project Area Map

Population and Flow Projections

The county's proposed project was designed to be able to handle all the projected flows from the current number of buildings (35) and area's population (84 people) as well as possible future sanitary sewer extensions in a manner consistent with Champion Township zoning and comprehensive planning efforts, as well as the regional water quality plan and facilities planning. The basis of design indicates that the proposed sanitary sewers have enough capacity to serve as many as 740 homes in the design year if the possible sewer extensions to the west and growth occur.

According to the county, there are five vacant lots in the project area that could be developed into either residential or commercial properties after project completion.

Alternatives

During project planning, Trumbull County considered two possible alternatives for serving the project area shown in Figure 1. These options are summarized below.

HSTS Upgrades – Constructing new HSTS to current on-lot treatment standards was considered briefly but was ultimately rejected because it would not be consistent with regional water quality plans and site conditions (soil types and small lots) limit their use.

Centralized wastewater collection – This option consists of installing a sanitary sewer collection system in the project area and conveying the flows to Warren's WWTP without making other improvements.

The county's present worth analysis of these two options shows that HSTS upgrades with an off-lot discharge would have a higher total present worth cost than a centralized wastewater collection approach. The county reached this conclusion based on its experience with analysis of similar projects.

Selected Alternative

Trumbull County's proposed project entails constructing a gravity sanitary collection system of roughly 4,700 linear feet of 18-inch sanitary sewer, 1,518 linear feet of 6-inch laterals, and 13 manholes to serve the project area along State Road from Oak Hill Drive east to Nezbar Drive (see Figure 1). The new collection system will convey flow via gravity to the existing 18-inch sanitary sewer just west of Nezbar Drive. As noted earlier, Warren's WWTP will process the flows originating in the project area. Private laterals will need to be installed between the edge of the rights-of-way to connect the 35 buildings with the proposed publicly owned laterals leading to the main gravity sanitary sewer located in a twenty-foot-wide easement on the north side of State Road.

Implementation

The total estimated construction cost of the county's proposed project is about \$1 million and does not include private property owner costs. Trumbull County qualifies for a zero percent interest rate loan payable over a thirty-year term. Utilizing an estimated \$1 million in WPCLF funding will save the county up to \$682,480 over the 30-year loan term compared to the current market rate of 3.79%.

The county will use \$230,000 in American Rescue Plan grant funds and a \$250,000 in Ohio Public Works Commission (OPWC) grant funding to finance part of this project and so reduce the WPCLF

amount it needs to borrow. Doing so will also reduce the assessment costs of property owners in the project area.

Currently, an average county residential sanitary sewer customer pays \$35.30 per month (\$423.60 per year). In addition to this amount, a typical residential customer in the project area can expect to also pay an assessment of between \$11,000 and \$20,000, tap-in fees of \$1,850, a septic tank abandonment fee of \$125, and for private laterals whose costs will depend on individual property conditions. As annual costs, these private homeowner fees are the equivalent of about \$500. As a result, an average resident can expect to pay a total of about \$925 each year or about 2% of the county's median household income (\$47,280) for this project. The alternative is to pay for these costs up front. Given the public support for this project explained in the next section, no significant adverse economic impacts on the project area's residents are anticipated.

Under the county's proposed project schedule, WPCLF funds are expected to be awarded in August 2022, so that construction can commence soon thereafter. The county estimates that construction can be completed in about six months.

Public Participation

A virtual public meeting for this proposed project was held on December 3, 2020. Based on the outcome of this meeting, the county estimates that 89% of the project area homeowners support this project. On this basis, the county appears to have adequately provided for public involvement during the planning for this project. Project information is available from the Ohio EPA contact named below.

Ohio EPA will make a copy of this document available to the public on its announcements web page (<https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>) and will provide it upon request. A copy may also be posted at the county's main building and on its web site (if available).

Environmental Impacts

The project has the potential to affect the following features, but the effects will be reduced or mitigated to acceptable levels as explained below.

Aquatic habitat and surface water resources - During the project's review, the only aquatic habitats identified in the project area included drainage ditches and no known named streams or wetlands. By providing soil erosion and sedimentation controls, seeding and mulching to restore areas after construction, and riprap to stabilize erodible locations near ditches, no significant adverse impacts on this resource attribute are expected.

While there are wetlands adjacent to the project area and future development is possible, the township's land use plans address water quality and aquatic habitat. By doing so, possible future development effects are expected to be minimal.

Endangered species, fish and wildlife, and terrestrial habitat - The project plans call for removal of trees with suitable habitat characteristics to occur only when Indiana bats and other bat species are not present (October through March). This seasonal cutting restriction is expected to limit

terrestrial habitat removal in the form of tree clearing to acceptable levels. Given the site conditions found in the project area, suitable habitat for three other known species is absent. Thus, no impacts on these federally listed aquatic and terrestrial species are expected.

Noise/traffic/aesthetics – With the noise, traffic, and other provisions in the detail plans to control activities that can affect these project area conditions, no significant, adverse, long-term impacts are expected. Rather, after completion of the project in about six months, noise and traffic levels should return to pre-construction levels. Further, a long-term improvement in area aesthetics is expected with elimination of failing HSTS and their replacement with a gravity sewer collection system.

Safety – The detail plans have the traffic and other safety measures needed to address this concern during the estimated six-month construction period.

Water Supply - Public water service is not available in the project area. Since no water wells are found within 50' of the proposed sewer, Ohio EPA expects that there will be no effect from any trench dewatering on private wells. Based on other projects, the county has a process to assist residents if they experience any loss of private water supplies.

Because of the county's project's scope, location, and prior disturbances, it is expected to have no adverse effect on air quality, archaeological and historic resources, coastal areas, energy use, farmland, floodplains, ground water resources, sole source aquifers, wetlands, and wild and scenic rivers.

Conclusion

Based upon Ohio EPA's review of the planning information and the materials presented in this Environmental Assessment, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to the environmental features discussed previously. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts will be temporary and mitigated. Overall, a net improvement in water quality is expected to result from the proposed project's construction no more than ten feet off State Road's existing north right-of-way. Conveying flows from the project area to Warren's WWTP is consistent with the regional water quality plan.

Contact information

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