June 27, 2019

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

Trumbull County
Belmont Park Sanitary Sewer Improvements
Loan Number: CS390079-0012

The attached Environmental Assessment (EA) is for a sanitary 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 proposed project. Making available this EA and seeking your comments fulfills Ohio EPA’s environmental review and public notice requirements for this loan program, as stated in the Ohio Administrative Code (OAC) 3745-150-06.

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 me at the letterhead address. 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,

Jonathan Bernstein, Assistant Chief
Division of Environmental & Financial Assistance

Attachment
ENVIRONMENTAL ASSESSMENT

Project Identification

Project: Trumbull County - Belmont Park Sanitary Sewer Improvements

Applicant: Mauro Cantalamessa, President
Trumbull County Commissioners
160 High Street NW
Warren, Ohio 44481

Loan Number: CS390079-0012

Project Summary

The Trumbull County Commissioners are requesting loan funds from the Ohio EPA Water Pollution Control Loan Fund (WPCLF) to finance a major part of the construction of a new sanitary sewer system serving the Belmont Park project area in the county. This area is currently served by failing home sewage treatment systems (HSTS) and package wastewater treatment plants. This project was originally nominated to the WPCLF in March 2010. Facilities planning information was prepared in February 2019 and submitted to Ohio EPA in March 2019.

The Belmont Park project is estimated to cost $3,419,112 of which $750,000 is expected to be funded by an Ohio Public Works Commission (OPWC) grant; $250,000 by an Appalachian Regional Commission (ARC) grant; $750,000 by a Community Development Block Grant (CDBG)/Residential Public Infrastructure Grant (RPIG) grant; $275,000 from Shepherd of the Valley for providing service to its $31 million development project; $33,000 from the county's metropolitan sanitary sewer district; and the remaining $1,869,112 through an Ohio EPA WPCLF loan with a thirty-year term and a zero percent interest rate. Construction is expected to begin in September 2019 and take a contractor seven months to complete.

By financing almost $1.9 million of the project costs through the WPCLF for 30 years, at an interest rate of 0%, the County will save an estimated $1 million over the life of the loan when compared to using conventional rate financing (assume 3.08% for 30 years). Readers should note that proposed Belmont Park sanitary sewer will tie into the previously completed parts of the Little Squaw Creek sanitary sewer and that the collected sanitary sewer flows will be conveyed to Girard’s Wastewater Treatment Plant (WWTP) for treatment followed by discharge to the Mahoning River. In addition, the proposed project will require project area residents to repay the WPCLF loan through sanitary sewer service charges over the next thirty years. Accordingly, the county estimates that an average residential sanitary sewer customer on private ground water wells in the project area will need to pay $930 per year for wastewater service and about $9200 in private homeowner costs ($920 per year associated with HSTS abandonment, sanitary sewer lateral installation, and other private costs) needed to establish a sanitary sewer connection to the proposed sanitary sewers that are included in this project. This figure is about 4.08% of the county’s latest median household income (MHI) of $45,380.

Please refer to the enclosed figures for the location of the proposed project and its significant environmental features.
The environmental review conducted by Ohio EPA, as described in this document, concludes the project will not result in significant adverse environmental impacts. In addition, appropriate mitigative measures have been proposed to reduce potential minor environmental impacts where they were identified. More information on these topics can be found below in the main sections of this environmental assessment.

**Proposed Project**

**Existing and Future County Conditions, including flows and population**

Trumbull County has a total population of approximately 203,300. Failing on-site HSTS pose a human health risk and adversely impact water quality. Existing sanitary sewer facilities are located primarily in urban and suburban areas in the southern part of the county. Every city in the county has water and sanitary sewer service for its residents, while about ½ of the townships have neither service. There are currently nine WWTPs operating in Trumbull County. The Trumbull County Board of Health reported at the beginning of this decade that more than 90 percent of the over 26,000 HSTS in operation in the county fail to pass inspections. Less than five percent of Trumbull County's soils are suitable to effectively support on-site HSTS.

To begin to correct this widespread pollution problem, the county developed a “Blueprint of Comprehensive Sewer & Septic Plan for Trumbull County, Ohio,” in 2007 and began to implement its strategy to address priority pollution areas resulting from failing HSTS. Trumbull County signed a Consent Order with the State of Ohio in 2007, identifying nine areas to be sewered by 2020. The long-term strategy also established all the areas which are likely to receive sanitary sewer service over the next 20 years. Of these nine project areas, four remain to be sewered, including Belmont Park and three others (Meadowbrook, Maplewood I and Maplewood II) in the county.

**Belmont Park Sanitary Sewer Project**

Belmont Park is a small unsewered community located at Belmont Avenue between Tibbetts Wick Road and Wilson Avenue in Liberty Township (see Figure 1). Trumbull County is proposing to extend a publicly owned sanitary sewer system to serve this area and replace failing HSTS. The area to be served consists of 99 existing residential homes, 22 other buildings, and will include the Shepherd of the Valley retirement home currently under construction and occupying 52 -55 acres. An additional 13 service connections for a total of 135 served buildings were included in the final plan sheets. More information on the wetlands in the Shepherd of the Valley development property can be found below in the “Environmental Impacts – Wetlands” section of this document. The County is required to complete the sanitary sewer project in Belmont Park by December 31, 2020. Based on the recent public meeting for this project, all of the property owners of the project area support it. There are 150 vacant parcels in the project area that apparently could support another 75 residential units if the area were to reach build-out conditions for a total of about 453 parcels in the project area. According to the county, public water service is only available on State Route 193 and Tibbetts Wick Road. All of the other buildings are on private ground water wells.

**Alternatives Analysis**

Trumbull County evaluated two options for addressing failing HSTS in the project area: (1) new HSTS and (2) sewers with regional wastewater treatment. The project is located in the Eastgate Regional Council of Governments (ECOG) jurisdictional area for wastewater facilities planning, under Section 208 of the Clean Water Act, as well as in the more narrowly defined City of Girard Clean Water Act.
(CWA) Section 201 Facilities Planning area. The CWA Section 208 management plan indicates the Belmont Park area is to be served by a publicly owned treatment works while adjacent new development could be served by either on-site system or a centralized sanitary sewer system. On this basis, evaluation of these alternatives by the County is consistent with the Water Quality Management Plan for the area and the Trumbull County Wastewater Treatment Planning Prescriptions and Options adopted July 31, 2006. See Figure 1 below.

![Figure 1. Girard WWTP CWA Section 201 Facilities Planning Area Map](image)

**Alternative 1 – Home Sewage Treatment System Replacements**

Alternative 1 involves replacement of the 122 HSTS of concern with new systems. During subsurface testing, the county found that the soil types in the project area, combined with the prevailing small lot sizes, do not support wastewater (septic system) leaching. In response, the county health department established that a public health nuisance exists in the project area. Furthermore, the facilities planning area map for Girard's WWTP shows in Figure 1 that the immediate Belmont Park project area is to be sewered as the only feasible option for this area. If they were to be feasible options, the findings of the geotechnical report (ground water between 8 and 19 feet below grade) and the small lot sizes found in the general Belmont Park area suggest that the majority of the HSTS would require off-lot discharges to existing ditches and swales. Estimated cost per system for replacement is $15,000. Estimated annual operation and maintenance costs are $1255 per household. Combining these costs, the present-worth estimate for Alternative 1 is $7,721,234 or $63,812 per home.
Alternative 2 – Conventional Collection System and Regionalized Treatment

Alternative 2 involves construction of a gravity and pressure sanitary sewer with a pump station in the service area flowing to an existing collection system manhole at the intersection of State Route (SR) 193 and Tibbetts Wick Road. The sewers would be constructed at a depth averaging between 10 and 15 feet with a maximum depth of 20 feet. Treatment would be provided by City of Girard’s WWTP as shown in Figure 1. Estimated average daily flow from the project area is expected to be 123,180 gallons per day (gpd). The present worth cost estimate for construction of this system would be $1,869,112. Operation and maintenance costs would run approximately $2,124 annually, for a total present-worth of $4,088,097.

Selected Alternative

Based upon the preceding analysis and the greater reliability of sanitary sewers, with minimal long-term operation and maintenance expenses for the homeowner, Alternative 2 was selected to be the cost-effective alternative for the project. The proposed project involves installation of approximately 16,000 linear feet (lf) of 8- and 10-inch diameter gravity sewers, 3,100 lf of 6-inch service laterals for 132 connections, 54 manholes, 1 sanitary pump station with appurtenances, and about 1,000 lf of 6-inch diameter polyvinyl chloride (PVC) and ductile iron force main in the project area. Sanitary flows from the PVC and high-density polyethylene (HDPE) conventional gravity sewers will be directed to Girard’s WWTP wastewater treatment plant to the south. Girard’s existing treatment facility has sufficient capacity to handle the additional flow, with construction underway to expand its peak flow retention capacity.

Readers should note that the proposed pump station is needed to serve the under-construction Shepherd of the Valley retirement home and any residential homes that cannot be reached with conventional gravity sewers. The county has the necessary equipment to operate and maintain sanitary sewer lines in excess of 400 linear feet between manholes proposed as part of this project.

All construction will take place within twenty feet of the edge of rights-of-way (ROW) in a permanent utility easement, not including a ten-foot wide allowance for temporary work easement where needed, or under the street surface. A permit-to-install (PTI) for the project was issued May 29, 2019 whose purpose is to eliminate the county-declared health nuisance, and provide an affordable solution for project area residents. Figure 2 below shows the project area. The streets in the project area include SR 193 at the Tibbetts Wick Road intersection and extending west along the northside of Tibbetts Wick 1,097 feet to the Pleasant Valley Road intersection, as well as the Belmont Park neighborhood including portions of Garfield, Liberty, Park, Lincoln, Harding and Wilson avenues, Edwards Street, Naylor Lloyd and Tibbetts Wick roads, and SR 193. Restoration of the project area will complete the proposed project.

Implementation

The total project cost based on the engineer’s estimate is $3,419,112 of which the city expects to borrow approximately $1,869,112 from the WPCLF at an interest rate of 0% payable over 30 years. This figure includes the cost of the technical services ($410,000) previously incurred by the county for this project. The estimated annual WPCLF debt service associated with this project after construction will be $63,000. WPCLF loan award is anticipated in August 2019. Construction is expected to be initiated in September 2019 and to require seven months to complete, ending in May 2020 or earlier. The county has indicated that no sewer rate increases above those already communicated to its service area residents are needed to pay for this project.
Environmental Impact of the Proposed Project

The sanitary sewer project discussed throughout this document is proposed to be located primarily under existing streets and within twenty feet of the edge of ROW. Where sewers are to be located outside of existing ROW, impacts have been evaluated and are discussed hereafter. Environmental impacts are described in general for each attribute and project information is highlighted for any unusual or noteworthy impacts or mitigation.

Major Landforms

Surface relief is nearly level to gently rolling over most of the planning area. Construction of the proposed improvements will not significantly alter landforms or the topography of the area since disturbed areas will be restored to pre-construction conditions. Therefore, with appropriate construction practices, the proposed sewer construction will not constitute a significant long-term or short-term change to the existing landforms.

Surface Water and Ground Water

With the exception of wetlands within the project area (discussed more below), the nearest major surface waterbodies in the Belmont Park project area are Little Squaw Creek, which is classified in
Ohio's Water Quality standards as warmwater habitat. No crossings of this stream will be required to construct this project.

Sediment and erosion controls will be used throughout construction of the various projects to minimize run-off from construction-related activities that could indirectly reach surface water, through storm sewers, ditches, etc. The work sites will also be properly restored following construction. Overall water quality in the area should improve due to elimination of failing HSTS. In particular with the contractor being required to maintain a storm water pollution prevention plan (SWP3) and with the county soil and water conservation district periodically inspecting the site for compliance with the SWP3, Ohio EPA expects that no significant adverse impacts to surface water should result from construction of the project.

Dewatering operations are expected to be necessary for installation of this sanitary sewer project. For those portions of the project area along SR193 and Tibbetts Wick Road that are on a public water line, Ohio EPA expects that ground water levels will not be adversely affected during the trench dewatering activities. This is because they should return to normal upon completion of the project and cessation of dewatering activities, and the public water supply will not be affected at all by trench dewatering.

For those parts of the project area still on private wells, the albeit unlikely potential does exist for trench dewatering to lower the ground water table to such an extent that private wells could be affected. For that reason, Ohio EPA has recommended that the county provide residents in the portion of the project area on private wells with this information and prepare to take the steps necessary should the need arise. If a homeowner’s well is affected, Trumbull County would act to establish a reliable source of water for the homeowner until no longer needed.

In addition to addressing this concern about trench dewatering, the county has indicated that trenches will not remain open or uncovered for extended periods of time, be limited to 300 feet in length, and potential contaminants (such as fuel and chemicals) will be kept away from trench sites.

As the detail plans include the statements needed for minimizing the effects of dewatering activities, Ohio EPA has concluded that the no significant adverse impacts to ground water or private drinking water supplies should result from this project and the dewatering needed to allow sewer and trench work to occur under dry conditions. In particular, the detail plans require that any dewatering flows be properly filtered or settled to remove sediment prior to release into any water resources or storm sewers. Upon completion of the project and cessation of dewatering activities, Ohio EPA expects that ground water levels will return to normal.

**Terrestrial and Aquatic Habitats**

A review of the project area was conducted by the Ohio Department of Natural Resources (ODNR). ODNR has record of the following species in the area:

- **Indiana bat** (state and federally endangered mammal species)
- **Bald eagle** (state threatened bird species)
- **Eastern massasauga** (state endangered and federally threatened snake species)
- **Clubshell mussel** (state and federally endangered mussel species)
- **Snuffbox** (state endangered mussel species)
- **Mountain brook lamprey** (state endangered fish species)
- **Trumpeter swan** (state endangered bird species)
In order to mitigate potential impacts to the Indiana bat, notes have been placed on the detailed plans for the project directing the selected contractor to avoid clearing non-street trees that could potentially provide summer habitat for these species. These types of trees include dead trees and snags, split tree trunks and/or branches or cavities, and live trees that have exfoliating bark, which may be used as maternity roosts, as well as trees in stream corridors, riparian areas and upland woodlots, which may provide forage sites. Any trees with these characteristics requiring removal should not be cut between April 1 and October 1, which is roosting season. The proposed Belmont Park sanitary sewer project area consists mostly of paved areas and maintained ROW, so no tree removal is required for the proposed sanitary sewer construction. Should any additional tree clearing be needed, the subject trees will be reviewed to ensure Indiana bat roost trees are not present. Tree clearing guidelines for Indiana bat habitat will be adhered to for the project to avoid potential adverse impacts to the species. According to the county sanitary engineer, Trumbull County performed all necessary tree removal for the Belmont Park Project in the winter months prior to April 1, 2019.

In terms of street trees, those trees in the way of construction or that are required to be removed for future maintenance reasons (i.e., whose roots would interfere with sanitary sewer operation) are generally few and will not be replaced. Loss of these trees is an unavoidable impact of this project. For those trees and wooded areas where these types of conflicts do not exist, the detail plans include the storm water pollution prevention plan drawings and mitigative measures needed to protect them.

Trumbull County lies in the range of the bald eagle, a state-threatened species; however, it is not anticipated the species will be impacted by construction, given the absence of any known eagle nests in the vicinity of the proposed project. The ODNR Division of Wildlife does not believe the yellow-bellied sapsucker and trumpeter swan will be affected due to the unsuitable type of habitat present in and adjacent to the proposed project areas. Due to the mobility of the black bear and bobcat, these species are unlikely to be impacted, if present. It is also unlikely an eastern massasauga will be encountered during construction, due to a general lack of suitable habitat; however, if one is encountered, work will stop, and the Division of Wildlife will be notified.

Most of the previously listed species generally prefer wooded areas near food sources, such as streams. Aquatic habitat found in stream areas may be preferred by – or required - for some of these species; however, aquatic habitat will not be adversely impacted by the proposed project. No stream crossings are required to construct the sanitary sewers in the project area.

Based upon lack of suitable habitat features, lack of identified presence of these species along the project routes, and use of appropriate mitigative measures for the project, no significant adverse impact to terrestrial or aquatic habitat will result from construction of the projects.

Land Use and Agriculture

Land use in the project area is mainly residential and commercial. Vacant lots are common throughout the project area so it is important to note that development may be in the form of infilling rather than taking prime farmland.
The Trumbull County Commissioners adopted the “Farmland Preservation Plan” in 1999. One of the recommendations in the plan continues to be to support urban redevelopment throughout the county in order to inhibit residential development in the rural areas. The plan outlines a number of growth management techniques in an attempt to prevent sprawl and control growth into undeveloped areas by directing development into areas that possess or are scheduled to receive necessary infrastructure to support the development. Agricultural land is further protected through a program that commits local governments to prohibit non-farm development when requested by landowners. Regional land use planning is conducted by ECOG. These projects are consistent with the recommendations and guidelines for sustainable development in the plan.

In addition, Trumbull and Mahoning counties formed a “Green Pact,” in 2006 which recognizes it is in the best interest of their residents, business community and natural environment to take practical steps to: protect the air and water, preserve natural resources, increase green space, reduce consumption of raw materials and increase recycling. Part of the Green Pact recognizes that the way communities in the two counties grow can have a significant impact on the environment and quality of life. The counties agree to examine codes and policies to determine how they can create walkable, bikeable communities, promote infilling, redevelop brownfields, protect natural resources such as trees, protect rivers through storm water controls, and create green infrastructure such as bio-swales and rain gardens.

Given the purpose of the project is to address contamination from existing failing HSTS, the proposed projects are not expected to increase population substantially or have a significant adverse impact on land use or agriculture.

**Wetlands and Floodplains**

Trumbull County is home to a number of wetland communities, some of which are within and adjacent to the Belmont Park project area; the most significant is the Shepherd of the Valley property found between Tibbetts Wick Road and Naylor Lloyd Road with its mix of high quality (Category 2 and 3 wetlands). None of these higher quality wetlands appear to be found in the immediate project area where construction has been proposed, or steps have been taken to avoid them or mitigate the construction impacts appropriately. The US Army Corps of Engineers (USACOE) reviewed this proposed project and based on the information in the Aquatic and Cultural Resources Evaluation report on the project agreed that the site contains approximately 0.46 acres of five possible wetlands that could be disturbed within the sanitary sewer alignment. Based on the site photos provided, the wetlands found appear to be mostly Category 1 or Category 2 wetlands, which support moderately good wildlife habitat, hydrological or recreational functions. The project consulting engineer, working or behalf of Trumbull County, has submitted General Permit information to the USACOE. According to the Army Corps of Engineers, the proposed sanitary sewer line project meets the conditions of a non-reporting Nationwide Permit (NWP) 12 covering utility lines. More specifically, the county may proceed with this project as long as it is in compliance with the conditions of the NWP 12 requirements summarized below:

1. Pre-construction notification (PCN) in accordance with Nationwide Permit General Condition 32 and Regional General Condition 6 is required for all permanent conversion to scrub/shrub and forested wetlands and for greater than 1/10 acre of temporary discharge of dredged or fill material into all wetlands.
2. The PCN must include a restoration plan showing how all temporary fills and structures will be removed and the area restored to pre-project conditions.
3. Anti-seep collars or clay plugs must be utilized for trenching activities conducted in a wetland.
4. This nationwide permit does not authorize the placement of manholes in wetlands.
5. Excess material must be removed to upland areas immediately upon completion of construction.
6. Ohio state certification general limitations and conditions apply to this nationwide permit.
7. Except for maintenance activities authorized under this nationwide permit, individual Clean Water Act Section 401 water quality certification is required for use of this nationwide permit when temporary or permanent impacts are proposed on or in waters meeting six specific criteria related to the quality of the water resources.
8. Temporary or permanent impacts to category 3 wetlands are limited to less than 0.1 acres for activities involving the repair, maintenance, replacement, or safety upgrades to existing infrastructure that meets the definition of public need. Ohio EPA will make the determination if a project meets public need during the ORAM verification process.
9. Temporary or permanent impacts as a result of stream crossings shall not exceed a total of three per stream mile per stream.
10. For an individual stream, while the repair or replacement of an existing culvert of any length is not limited by this certification, any culvert extension shall not exceed 300 linear feet.
11. All hydric soils up to 12 inches in depth within wetlands shall be stockpiled and replaced as the topmost backfill layer. Best management practices, such as silt fencing and soil stabilization, shall be implemented to reduce erosion and sediment run-off into adjacent wetlands.
12. Buried utility lines shall be installed at a 90-degree angle to the stream bank to the maximum extent practicable. When a 90-degree angle is not possible, the length of any buried utility line within any single water body shall not exceed twice the width of that water body at the location of the crossing.
13. The total width of any excavation, grading or mechanized clearing of vegetation and soil shall not exceed a maximum of 50 feet.
14. Applicable nationwide conditions also must be met in addition to regional and state level conditions.

Regardless, any required mitigation is expected to be promptly and fully implemented. The plans and specifications approved for this project reference these and other mitigation steps needed to assure that impacts to any wetlands during construction are minimal and insignificant in duration, extent, and magnitude.

With the exception of the proposed pump station building housing the below-grade pumps and force main components, all parts of this sanitary sewer project will be located underground. Because these components are located in a Zone X (Area of Minimal Flood Hazard) designated area, no floodplains are present and so no impacts to this resource attribute will occur. Based in part on these factors, no significant adverse impacts to floodplains will result from construction of the project.

Readers should also note that the proposed pump station building location is in close proximity to a Category 2 wetland on the Shepherd of the Valley property. Assuming that the construction of this facility occurs as shown on the detail plans and does not encroach on the wetland (shown as not to be disturbed), no impacts on wetlands from this part of the project are expected. Another factor in Ohio EPA’s decision is that the detail plans include the provisions needed to prevent sanitary sewer trenches from functioning like French drains and result in a hydrologic change that could alter permanently how the five known wetlands function in the project area. With the county requiring that all disposal of excess soil, debris, and materials be done in an environmentally sound manner so as to avoid any disposal in or near any water body, floodplain, wetland, drainage course, or environmentally sensitive area, even with the permission of the property owner, and that Ohio EPA staff be notified of these disposal sites, Ohio EPA has concluded that wetlands in Figure 4 and floodplains offsite will be properly protected during this project.

Further support for this conclusion is the requirement in the detail plans that all avoided water resources and associated buffers/riparian areas shall be demarcated in the field and protected with suitable materials (e.g., silt fencing, snow fencing, signage, etc.) prior to site disturbance. These
materials shall remain in place and be maintained throughout the construction process and shall be entirely removed once construction is completed.

Finally, the detail plans and specifications for this project contain the mitigation needed to assure that the horizontal directional drilling of thirteen long sewer laterals and the force main's installation does not result in significant, adverse impacts on wetlands during construction and that excess excavated material is not placed in any wetlands along the alignment or off-site.

Figure 3. Wooded Wetland Photo East of Shepherd of the Valley Development
Archaeological and Historic Resources

Between February and March 2019, the State Historic Preservation Office of Ohio (SHPO) reviewed the county's project and the proposed Shepherd of the Valley Lutheran Retirement Services Corporation elderly care facility project locations. Based on these reviews, the SHPO staff concluded that the proposed project and related construction of the elderly care facility will not affect historic properties and that no further coordination is required for this project unless the scope of work changes or archaeological remains are discovered during construction. As the detail plans (Sheet 4) includes the needed language to cover such a contingency, Ohio EPA has concluded that there should be no significant adverse short or long-term impacts to archaeological or historical resources due to this project or from development it supports.

Air Quality

Trumbull County is currently in attainment with all federal air quality pollutant standards. In addition to ozone, pollutants monitored for air quality are particulates, sulfur dioxide, nitrogen oxide, lead, and carbon monoxide.

The proposed projects may result in a temporary increase of dust and fumes from construction activities. This will be mitigated using standard construction control practices, such as dust suppressants, emission controls, and use of properly operated equipment in good working order as
noted in the detail plans. With these mitigative measures in place, effects on air quality will be short-term, ending when construction is complete; therefore, no significant adverse impact to air quality will result from project implementation. With regard to long-term air quality, the State Implementation Plan (SIP) for non-attainment areas will address how to achieve compliance with the national ozone standard. Once the construction is complete, air quality should return to pre-construction levels; thus, there should be no significant adverse impacts to air quality as a result of the project.

**Noise, Traffic & Aesthetics**

An increase in noise levels may be noticeable in the project areas during construction. However, construction will take place during normal workday hours to help minimize disturbance, and these impacts will be short-term in duration, ending when construction is complete. With the equipment used on this project having proper intake silences and mufflers, no significant adverse impacts with respect to noise should result from construction of the project.

A short-term increase in traffic may be noticeable in the area due to delivery of equipment and materials during construction. As a result, the county is requiring that the contractor prepare and follow a traffic control plan during this project. On this basis, Ohio EPA has concluded that traffic flow will not be significantly impacted as residences will be accessible during construction.

No major recreational features, designated natural areas, or scenic rivers are located within the project area. Adverse impacts to aesthetics will not result from the project, as the work will take place primarily in disturbed areas.

**Energy Use**

Based on the planning information provided by Trumbull County, construction of this proposed project is not expected to require a significant amount of non-renewable energy. As such, the planned seven-month construction period, with its energy use in the form of fuel consumption, is unavoidable if the human health and wastewater needs of the project area are to be addressed. On this basis, no significant, short- or long-term adverse environmental impacts on energy use are expected to result from the construction activities involved in the county’s project. Ohio EPA has drawn a similar conclusion about the long-term energy use required by the county’s collection system, especially the proposed pump station to serve the Shepherd of the Valley development and adjacent parcels. Overall, non-renewable energy use is expected to be more than current demand following construction of this proposed project and the new development, but is not expected to result in any significant direct or indirect adverse environmental impacts on energy resources, or the air pollution energy production creates within the range of electrical energy already currently available.

**Local Economy**

According to Trumbull County, the vast majority of residents in the project area rely on private wells for their domestic water supply. As a result, the county has shown that a typical wastewater customer without public water will be billed a flat monthly sewer bill of $39.94 plus a $2 replacement improvement fee for a monthly bill of $41.94 per month. This fee will only cover operation, maintenance, and replacement costs. In addition, the project area residents will be required to pay a maximum monthly capital charge to cover the debt portion of the project, or $35.54 per month. If the project comes in below budget, the capital charge will be reduced accordingly. Should the project
when come in over budget, the sewer district will absorb the additional cost. Thus, the maximum total monthly bill for a property owner on private wells is an estimated $77.48 ($930 per year).

For those few property owners not on private wells, using an average monthly water usage of 4500 gallons/month, and living along SR 193 and Tibbetts Wick Road, the corresponding monthly sewer service charge is expected to be $67.51 based on a fee of $31.97 to cover O&M costs plus a maximum amount of $35.54 to cover debt service repayment on the county’s proposed WPCLF loan. This monthly figure translates to $810.12 per year.

According to the county, the estimated maximum monthly capital charge to recover debt has been set at $35.54 and per its policy will not exceed this amount. Should the project debt be lower than the estimated $1,561,099 amount, the monthly capital charge will be reduced accordingly. The county has indicated that the rates of the its Metropolitan Sanitary Sewer District may be subject to future increases. The county’s current water rate in the Southeast Water District is $8.22/1000 gallons.

Miscellaneous costs associated with connecting to the sewer system include a tap-in fee, plumbing inspection and HSTS abandonment fee, any necessary plumbing modifications as a result of the inspection, actual HSTS abandonment costs, and the cost to extend the house lateral from the building foundation to the main sewer located in the public right-of-way. The tap-in fee is a onetime charge of $1890 per single residential equivalent (SRE). The Trumbull County Health Department plumbing inspection and HSTS abandonment fee is $125 and all needed interior/exterior plumbing costs may be less or more than $375. The cost to install the lateral from the house to the main line is dependent on the distance from the home to the ROW, as well as soil conditions and isolation water/sewer service line isolation distance requirements, but has been estimated at $6,000. The HSTS abandonment cost is estimated at $800. The MHI for the county is $45,380. When annualized, these total project costs for residents on private wells ($1850), including individual homeowner expenses ($920) and sewer service charges ($930) represent 4.08% of the county's MHI. Readers should note that $200,000 in CDBG/RPIG funding out of the total of $750,000 will be targeted to low- and moderate-income people in the project area. Of the $750,000 in CDBG/RPIG Program funds, $620,000 is for the sanitary sewer main line part of the project while $100,000 is for homeowner lateral connection improvements, and $30,000 is for administrative costs. The lateral costs will be matched by Trumbull County low and moderate income (LMI) direct benefit funds in the amount of $190,750.

Project area residents will have the option of paying tap-in fees in a lump sum prior to project completion or over a five-year period at a 0% interest rate through installment payments attached to the county auditor’s real property tax duplicate. Financed in this way, non-LMI residents could expect to make annual payments of $389 a year for five years, including the three percent annual collection fee of $11 per year on top of the $378 per year required to pay off the total tap-in fee of $1890. LMI residents would see about a $50 savings from this program.

Once the project has concluded, Trumbull County will calculate the final capital charge based on the actual construction and administration costs, not to exceed the tentative capital charge presented above and based on the final opinion of probable cost, or engineer’s estimate. Only those currently vacant properties receiving a 6-inch diameter service connection as part of this proposed project will be subject to a monthly capital charge for a term of 30 years. There will be no costs to the owners of vacant properties until such time the property is developed and a connection to the sanitary sewer system is necessary.
Public Participation

The following agencies have reviewed, and were provided an opportunity to comment on, the proposed project:

- Ohio Environmental Protection Agency
- Ohio Department of Natural Resources
- Ohio Historic Preservation Office
- Eastgate Regional Council of Governments
- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service

The County held multiple public meetings on the proposed project from 2017 through 2019. Most recently, these included a February 21, 2019 meeting with a public comment period extending through March 1, 2019 and a second one held on May 14, 2019 for the community development block grant program. Minimal to no public controversy is known to exist at this time. The county communicated with residents of the project area during the planning process, and the county met with residents over concerns with tree clearing and costs. A resolution of necessity for this proposed project was issued by the county commissioners on January 16, 2019 in anticipation of the two CDBG public meetings held in February and May 2019. In general, the county notified its residents of these public meetings two to four weeks ahead of the meeting through individual letters and legal notices in a newspaper of regional distribution.

Based upon the critical need for the project to protect public health and the environment, no significant adverse impact to local economy is expected to result from the project. It should be noted that the county has worked diligently to find grant and low-interest funding to offset project costs.

Reasons for a Preliminary Finding of No Significant Impact and 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. Through avoidance of environmentally sensitive areas, adherence to prohibited construction activities, and the use of mitigative measures as outlined in this document, the impacts from construction should generally be short-term and insignificant. Since the proposed project is designed to eliminate water pollution from failing home sewage treatment systems and eliminate package WWTPs, no significant adverse impacts should result from project implementation or the oversizing of the sanitary sewers used in a portion of this proposed project to serve the Shepherd of the Valley development.

Questions or Comments/Contact

For further information or comments regarding the project discussed herein, please contact:

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