



September 24, 2024

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

**Trumbull County
Meadowbrook Sanitary Sewer Improvements
Loan Number: CS390079-0056**

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, reading "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

Project Identification

Project: Meadowbrook Sanitary Sewer Improvements

Applicant: Trumbull County
160 High Street
Warren, Ohio 44481

Loan Number: CS390079-0056

Project Summary

Trumbull County has requested funding from the Ohio Water Pollution Control Loan Fund (WPCLF) for the Meadowbrook Sanitary Sewer Improvements project. The county's proposed \$14-million project consists of gravity sewers, manholes, and a package wastewater treatment plant (WWTP) to service 111 structures.

The purpose of the proposed project is to eliminate household sewage treatment systems (HSTS) and convey the collected wastewater to the county's proposed Meadowbrook WWTP. To finance the proposed project, the county expects to borrow as much as \$11 million from the WPCLF. The project is eligible for a portion of this amount as principal forgiveness.

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.

History & Existing Conditions

Trumbull County is responsible for the sanitary sewer infrastructure within unincorporated areas of the county. The project area is in the vicinity of Leavitt Road and Meadowbrook Drive in Warren Township, Trumbull County. The project area is not currently served by central sanitary sewer, with residents and commercial properties dependent on failing off-lot household sewage treatment systems (HSTS), discharging untreated sewage into the Mahoning River.

The project area is part of a consent decree between the Ohio EPA and Trumbull County due to failed off-lot septic systems. The Warren Township trustees have been requesting this project for decades. The elimination of the failed septic systems will benefit not only the project beneficiaries but recreational users in the Mahoning River.

Figure 1 below shows the service area for this proposed project.

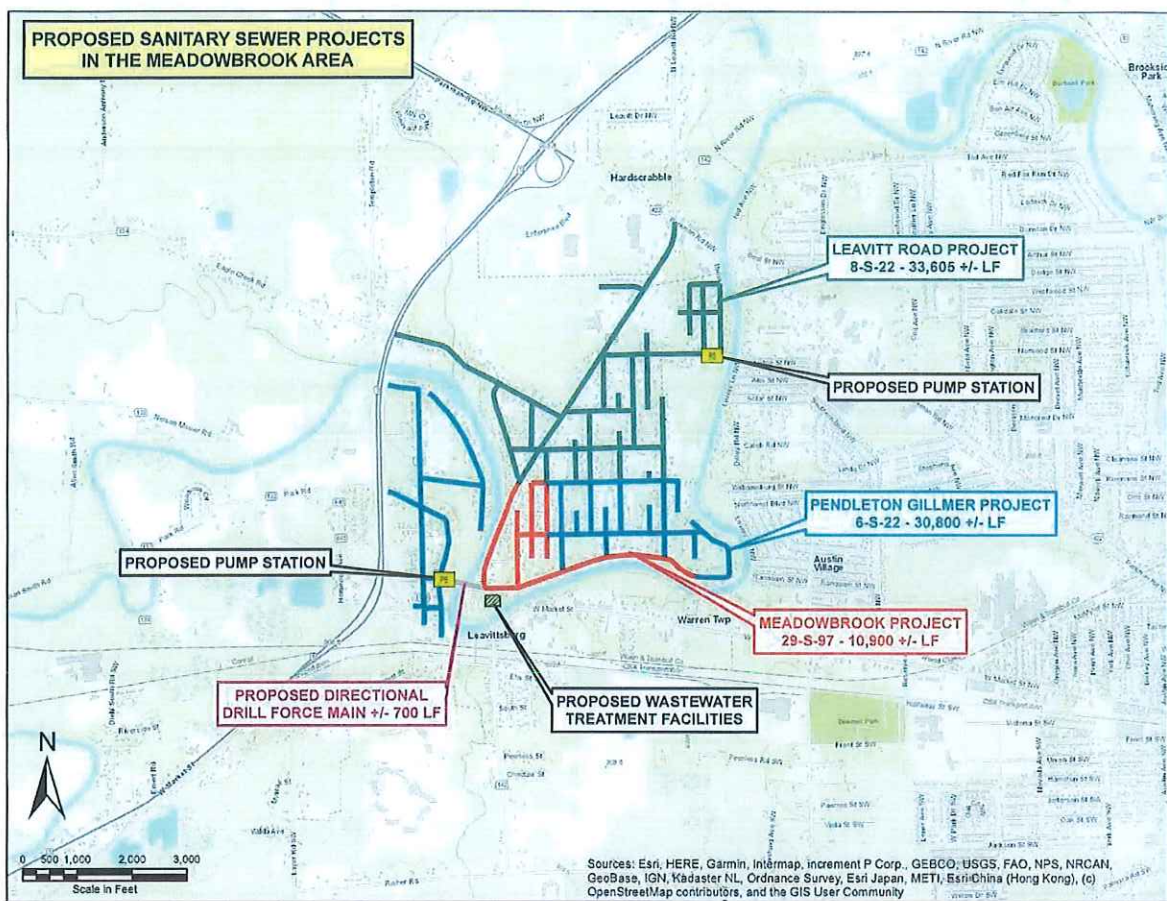


Figure 1. Meadowbrook project area

Population and Flow Projections

The new collection lines will be constructed as part of an adjustment to the area's General Plan of Sewers. Sewage flows from the project area will be directed to a proposed 350,000-gallons-per-day (gpd) package WWTP which will discharge into the Mahoning River.

The county's proposed project was designed to be able to handle all the projected flows from the 111 properties as well as possible future development within the boundaries of the project upon completion of the installation of sanitary sewers, the lack of which has hindered residential and economic development in this area.

Alternatives

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

Alternative #1: Household Sewage Treatment System (HSTS) Replacements

The criteria used by the Trumbull County Board of Health for approval of an HSTS include the following: soil permeability, housing density, and lot size. Recent data suggests that at least 90% of the existing HSTS would fail the current treatment requirements.

For this alternative, the county has assumed that 90% of the existing systems would require replacement in order to fulfill the goals of this project. Of the 111 existing structures that are currently served by an HSTS, the majority will require an off-lot discharge into existing ditches and storm sewers which will eventually enter the Mahoning River. Therefore, the majority of the new off-lot septic systems would require the following components at a minimum:

1. A settling tank with adequate depth and volume to separate and hold primary solids.
2. An aeration system to reduce the biological oxygen demand or BOD of the waste stream.
3. Properly sized alternating sand filters to reduce suspended solids.
4. Disinfection utilizing a chlorination/dechlorination system.

Alternative #2: Conventional Collection System & Treatment

This alternative involves construction of a gravity sanitary collection system consisting of 7,220 linear feet of 8-inch sanitary sewer and 3,502 linear feet of 18-inch gravity sewer to serve the project area along North Leavitt Road, Meadowbrook Drive, Turner Road, Bosworth Road, Pendleton Road, Pangborn Road, Hobart Road, and Flora Road. The new collection system will flow via gravity to the proposed Meadowbrook WWTP to be constructed by the county as part of this project. The new plant will be a package type extended aeration treatment plant with effluent filtration. The Meadowbrook WWTP will be situated near Meadowbrook Drive and Old Leavitt Road and will discharge to the Mahoning River.

Selected Alternative

The selected alternative is to construct a central sanitary sewer collection system and a package WWTP to provide service to the project area. This recommended alternative is the most economical and environmentally conscious approach to satisfy the needs of the affected residents and Trumbull County. Furthermore, this recommended alternative is compatible with the long-term wastewater planning efforts of the Region's Clean Water Act Section 208 Area Wide Water Quality Management Plan.

As shown in Figures 2 below, there are no stream crossings in the project area. The sanitary sewer system will be installed via open cut trenches. The proposed WWTP will include a new discharge to the Mahoning River.

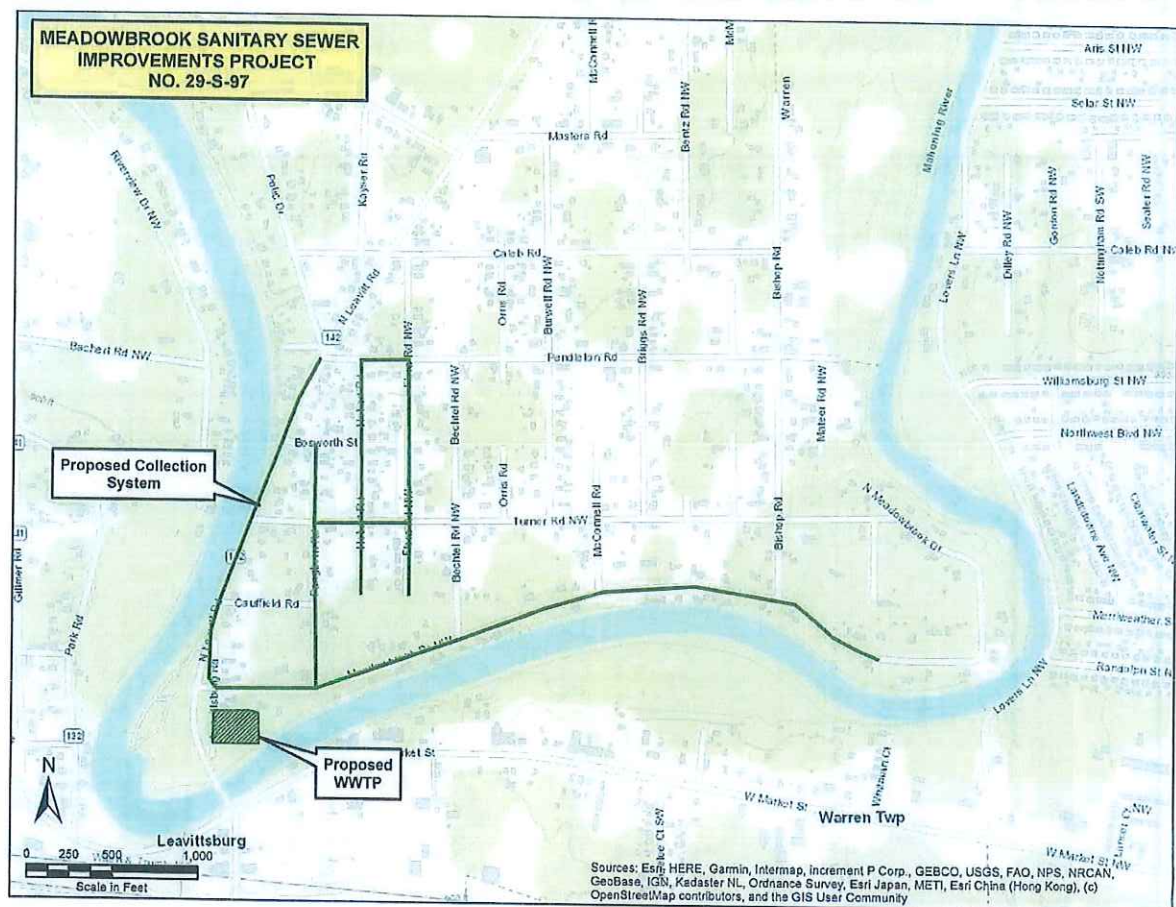


Figure 2. Proposed project map

Implementation

The total estimated construction cost of the county's proposed project is \$14 million. Of this amount, the county requested \$11.6 million from the WPCLF program, of which \$4 million is available as principal forgiveness and the remainder at a 0% interest rate. In addition, the county has received a \$1.5 million Ohio Public Works Commission (OPWC) grant, and a \$250,000 Appalachian Regional Commission (ARC) grant to assist with this project's funding.

The long term project debt is to be retired through monthly capital charges attached to sewer bills. The current rate for sewage treatment in Trumbull County is \$9.75 per 1,000 gallons plus a \$2/month replacement improvement fee. The average household can expect an annual sewer bill (based on 5,000 gallons/month) of \$621. Based on the county's median household income (MHI) of \$50,258, the annual bill represents 1.23% of the county's MHI.

Under the county's proposed project schedule, WPCLF funds are expected to be awarded by December 2024 so that construction can commence soon thereafter. The county estimates that construction can be completed in about 15 months.

Public Participation

According to Trumbull County, a public hearing will be held on October 3, 2024 to provide citizens with pertinent information about the county's proposed project. This includes an approximate 30 day public comment period. All costs expected to be incurred by all property owners will be disclosed in the public hearing notices mailed to each property owner.

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.

Air quality and energy use – While Trumbull County is in full attainment for all six priority air pollutants, any fugitive dust generated by this sewer construction project shall be controlled. The project is such that effects on air quality and energy use will be minimal and temporary during construction. Operation of the county's new WWTP will require energy, but is expected to be typical of facilities of this type and unavoidable.

Aquatic habitat, surface water resources – Three stream resources are found in the project area and include the Mahoning River, Chocolate Run, and an unnamed tributary to the Mahoning River. An additional two streams were identified directly adjacent to the study area. One is an ephemeral stream located just west of Park Road and north of Clemens Court. The second is an intermittent stream located just west of North Leavitt Road NW and north of Eagle Creek Road. These streams are located outside of the right-of-way.

Based on the findings of the county's waters investigations, it appears that 524 linear feet of potentially regulated streams and 0.411 acre of potentially regulated wetlands are located in the study area. However, as no stream crossings or work in wetlands is proposed, they will be unaffected.

By providing soil erosion and sedimentation controls, seeding and mulching to restore areas after construction, no significant adverse impacts on this resource attribute are expected. See Figure 3 below.

Archaeological and historical resources – According to the county's project planning information, a cultural resources due diligence records review was completed in October 2022. The State Historic Preservation Office's (SHPO's) mapping system revealed there are previously surveyed architectural resources or national register of historic places (NRHP) listed or eligible resources located within the project area boundaries. While some resources were identified within the project area, the State Historic Preservation Office concluded in November 2022 that none of these resources will be adversely affected by the proposed sanitary sewer regionalization project. Ohio EPA concurs.

Endangered species, fish and wildlife, and terrestrial habitat – As the project area is within the range of the federally endangered Indiana bat, northern long-eared bat, and the proposed endangered tricolored bat, any removal of trees with suitable habitat characteristics should occur only during October through March. The county has agreed to follow the recommended seasonal cutting

restrictions. Significantly, the proposed force main will cross through a wooded area, but the impacts are expected to be minor. Accordingly, Ohio EPA has concluded that this will 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 other two other known federally listed species (the eastern massasauga rattlesnake and the monarch butterfly) appears to be absent. Thus, no impacts on these federally listed species are expected.

According to ODNR, the following species are found in the vicinity of the project area: northern brook lamprey, spotted turtle, eastern hellbender, American bittern, least bittern, northern harrier, sandhill crane, trumpeter swan, and upland sandpiper. As habitat for these species is either absent or will be mitigated during construction, no significant adverse impacts on them are expected.

Floodplain - While the proposed sanitary sewer component of the overall regionalization proposal is not expected to have any significant, adverse impacts on floodplains and/or floodways, the WWTP is located in the floodplain of the Mahoning River and its tributaries. To address this concern, the county has designed the WWTP to be flood protected to an elevation of 892 feet above mean sea level.

Ground water resources – According to the county's geotechnical report, high ground water conditions were observed at several locations. As a result, dewatering may be required during gravity sewer installation. Because the county's detail plans and specifications include the necessary mitigative measures, Ohio EPA has concluded that no significant adverse environmental impacts (either short-term or long-term) should occur.

Noise/traffic/aesthetics/safety – With the noise, traffic, and safety 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, noise and traffic levels should return to pre-construction levels. Further, long-term improvements in area aesthetics are expected with elimination of failing HSTS.

Local economy – Following connection to the sanitary sewer, residents will begin paying a monthly bill. Additional charges will include a one-time tap-in fee of \$1,850 per dwelling, septic abandonment fee of \$125, and the cost to extend the lateral to the sewer. Any owner-occupied low-to-moderate income (LMI) households will only be responsible for the tap-in fee.

Unaffected features – Based on the project's location, the proposed project is expected to have no effect on coastal areas, sole source aquifers, and wild and scenic rivers. These environmental attributes are not in the project area.

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.

Contact information

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