



Mike DeWine, Governor
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December 22, 2021

Limited Environmental Review and Finding of No Significant Impact

**Village of Jefferson – Ashtabula County
Market & Sundry Streets Sanitary Sewer Lining
Loan number: CS390475-0006**

The attached Limited Environmental Review (LER) is for a wastewater infrastructure improvements project in the Village of Jefferson 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 LER describes the project, its costs, and expected environmental benefits. Making available this LER fulfills Ohio EPA's environmental review and public notice requirements for this loan program.

Ohio EPA analyzes environmental effects of proposed projects as part of its WPCLF program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. This project's relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment. More information can be obtained by calling or writing the person named at the end of the attached LER.

Upon issuance of this Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

Jonathan Bernstein

Jonathan Bernstein, Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Market & Sundry Streets Sanitary Sewer Lining

Applicant: Village of Jefferson
27 East Jefferson Street
Jefferson, Ohio 44047

Loan number: CS390475-0006

Project Summary

The Village of Jefferson in Ashtabula County has requested roughly \$550,000 in financial assistance from Ohio EPA's Water Pollution Control Loan Fund (WPCLF) to improve the condition of part of its sanitary sewer collection system in the south-central part of the village. Figure 1 below shows the location of the proposed sanitary sewer lining and related improvements project. The majority of the work consists of cleaning and lining of sanitary sewers, rehabilitating lateral connections and manholes, and replacing laterals in order to reduce infiltration/inflow (I/I)¹ in the collection system.

All of the proposed construction will occur within prior-disturbed areas in and along streets on the south-central side of Jefferson. The proposed sanitary sewer lining and related construction activities are expected to maintain, if not improve, the operation of the village's wastewater collection system and provide at least a twenty-year solution to the village's collection system needs by reducing the I/I found within this part of the village's sanitary sewers. By completing the proposed improvements during this proposed project, Jefferson expects to improve the structural integrity of its sanitary sewer system.

Based on the above costs and the proposed WPCLF funding, Jefferson has determined that its current average residential wastewater bill of \$361.70 per year should not need to increase to pay for this proposed project. However, while Jefferson adopted its most recent wastewater rate increase of 3.5% in 2021, future annual rate increases of 3.5% to keep pace with inflation are planned. The village estimates that its proposed sanitary sewer lining and related improvements project will require about five months to complete.

History & Existing Conditions

The village's sanitary sewer system is subject to excessive amounts of I/I. As a result, Jefferson's wastewater collection and treatment systems experience frequent problems. For this reason, the village is on a compliance schedule to address these hydraulic overloading problems as noted in its

¹ I/I is defined as extraneous, clear water that enters a sanitary sewer system through surface or subsurface locations. Infiltration usually occurs when clear water enters the system below ground through cracked or broken pipes and manholes, poorly sealed or misaligned pipe joints, damaged or poorly connected sewer laterals, etc. Inflow may include clear water entering the system through manhole covers, roof or foundation drains, direct storm sewer connections, etc.

National Pollutant Discharge Elimination System (NPDES) permit. By no later than December 31, 2021, the village is required to complete an evaluation of its entire collection system to quantify all sources of I/I and submit a report that outlines specific locations of excessive I/I, actions to be taken to eliminate sources of I/I, and a schedule to complete all necessary wastewater system improvements.

Project Description

Jefferson's proposed sanitary sewer lining project includes cleaning and videotaping of sanitary sewers prior to installing cured-in-place liners in the village's sanitary sewers, re-instating lateral connections, rehabilitating sanitary manholes, and replacing sanitary laterals as needed to reduce the amount of I/I in Jefferson's sanitary sewer system and subsequently improve the operation of the village's wastewater treatment plant (WWTP). Building on its previous experience with similar projects, the village expects that water quality in tributaries of Lake Erie will benefit. These streams and their physical proximity to the proposed improvements are shown below in Figure 1 on Page 3.

More specifically, the village's proposed improvements include: 7,000 feet of sanitary sewer cleaning, lateral tee joint sealing and connection reinstatement, 4,300 feet of eight-inch diameter cured-in-place pipe (CIPP) lining, 400 feet of ten-inch diameter CIPP lining, 730 feet of twelve-inch diameter CIPP lining, abandoned sanitary sewer tap removals, and six-inch diameter sanitary sewer lateral installation with test tees and cleanouts. During construction, the contractor will need to maintain traffic throughout the project area and replace small sections of roadway pavement to restore the village's streets for use by vehicular traffic.

Implementation

The current estimated total cost of the village's proposed project is \$550,000 of which approximately \$450,000 is for construction and \$91,000 is for planning, design, and construction inspection costs. To implement the proposed project, the Village of Jefferson intends to finance it through an Ohio Public Works Commission (OPWC) \$198,000 grant, a \$132,000 OPWC 0% loan, and a \$220,000 0.31% loan from Ohio EPA's WPCLF.

Assuming the project funding presented above, Ohio EPA expects that the village will save about \$46,300 when compared to a market-rate loan of 1.9%. By proposing to fund its project in this way, Ohio EPA anticipates that the Village of Jefferson should be able to generate enough revenue under its current and proposed wastewater rate structure to continue to own, operate, and maintain its wastewater collection and treatment systems well into the future.

Jefferson's most recent sanitary sewer charge increase of 3.5% was in 2021. This increase resulted in an average village residential wastewater customer using about 433 cubic feet (3,239 gallons) per month paying a fee of about \$26.63 per month (\$319.56 annually) for wastewater services. In addition to this usage fee, each wastewater customer pays \$48 annually as a permit compliance charge that brings the total annual fee to \$367.56. When expressed as a percentage of the village's latest median household income (MHI) figure of \$56,800, this total annual fee is about 0.65 % of the village's MHI. The village has indicated that future annual sewer service charge increases of 3.5% to keep pace with inflation are planned.

WPCLF funds are expected to be awarded in January 2022, so that construction can commence soon thereafter. The village estimates that construction on this project can be completed in about five months.

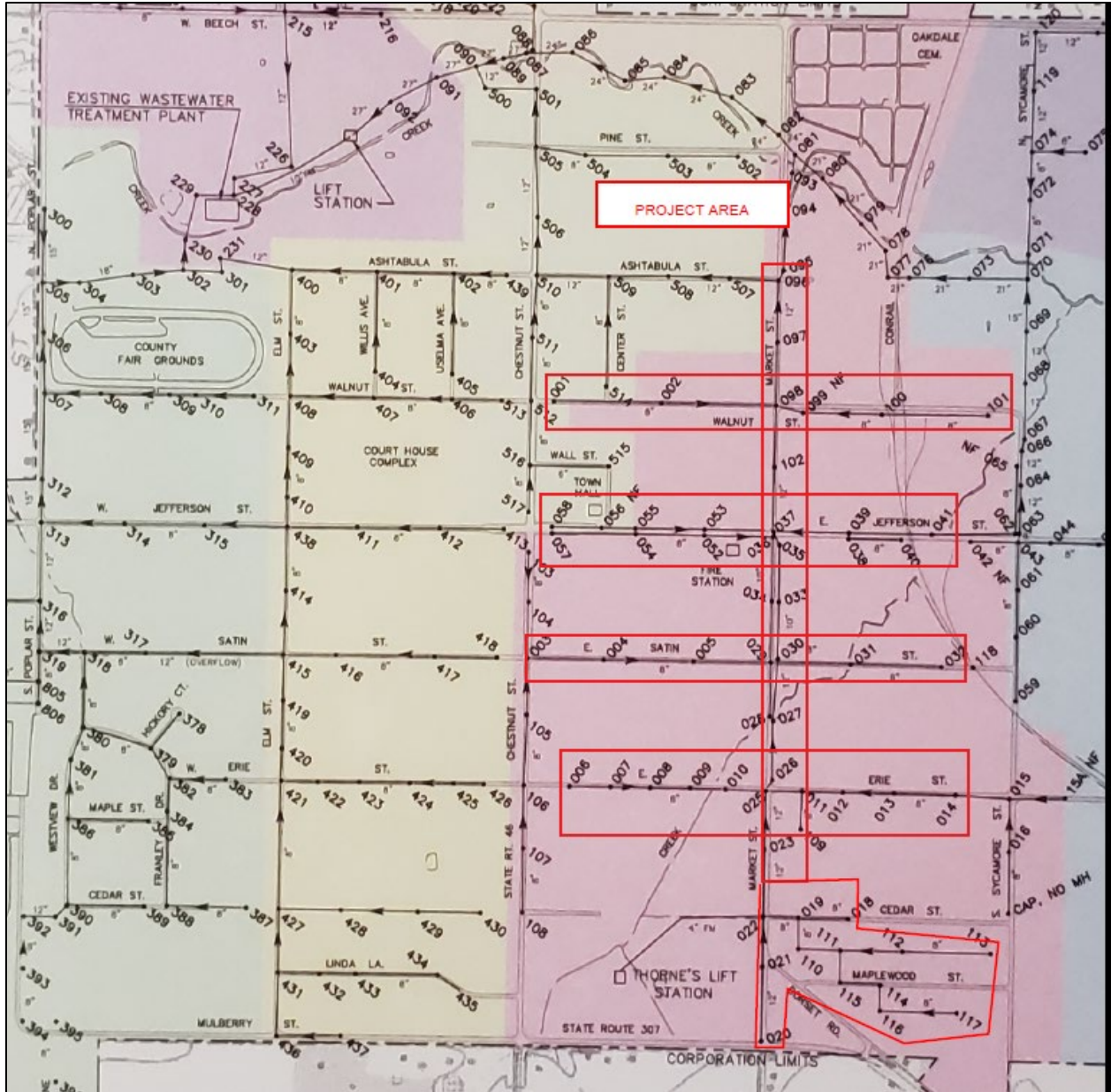


Figure 1. Village of Jefferson project location map

Public Participation

According to Jefferson, public involvement on this project included village council meetings held on April 5, 2021, August 16, 2021, and September 7, 2021. These meetings gave the public opportunities to learn about the proposed construction and funding of the village’s proposed sanitary sewer lining project.

On this basis, and the limited scope of the project covered by this document, Ohio EPA has determined that no additional public review and comment on the proposed project is necessary. All potentially interested parties appear to have been given adequate opportunity to review and comment on this project and its costs.

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 village's municipal building and on its web site (if available).

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action in a sewerred community that is for minor upgrading and/or minor expansion of existing wastewater collection infrastructure. This category does not include actions that directly or indirectly involve the extension of new collection sewer systems.

As all the proposed improvements will be limited to previously disturbed locations, the proposed construction is expected to result in no short- or long-term adverse environmental impacts. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no effect on high-value environmental resources. Given the proposed sanitary sewer lining project's generally limited scope within prior-disturbed areas in Jefferson, the village's proposed wastewater improvements will have no effect on high-value environmental resources. For example, no stream crossings or tree removal is proposed and access to the sanitary sewers needing repair will be through existing manholes during construction. As shown in Figure 1, the five nearest creek locations in the project area are isolated from the proposed construction. Overall, the project area lacks important natural features.

In terms of cultural resources, the project area is known in part for a local historic district and two buildings on the national register of historic places, including the Jefferson Town Hall and a law office associated with a 19th century abolitionist. However, the type of sewer repair associated with the proposed project will have no effect on the local historic district's structures or the two national register sites.

Will have no significant negative environmental effects and will require no specific impact mitigation unique to the assistance proposal because construction activities generally are limited to prior-disturbed locations under and along the village's streets in the project area shown in Figure 1. The proposed work to complete this project is straight-forward and the detail plans and specifications for the proposed project include the impact mitigation needed to address any concerns that could arise during construction. In particular, village residents may encounter noise and traffic pattern changes during construction, but these effects on the human and natural environment are expected to be minimal with the impact mitigation (traffic maintenance) included in the project plans. Less than one tenth of an acre of land is expected to be disturbed by construction activities.

Is cost effective and not a controversial action. In comparison to the no-action option briefly considered during project planning, the chosen improvements were selected by the village as more cost effective on the basis of costs and non-monetary permit compliance factors. Moreover, the proposed improvements constituting this project are non-controversial because they will not adversely impact the environment, or the residential rates for wastewater.

Will not create a new, or relocate an existing, discharge to surface or ground waters, or cause pollution of surface or ground waters. The village's proposed project will not result in either new, relocated, or additional discharges of wastewater to either surface or ground water on a permanent

basis. Rather, the purpose of this project is to help ensure that Jefferson can continue to meet its responsibility to properly convey wastewater flows through its sanitary sewer collection system to its WWTP over the next twenty years. Further, no changes in the capacity of the village's WWTP or a discharge of additional pollutants to local surface water resources are expected in response to this project in Jefferson.

Will not result in substantial increases in the volume of discharge, or the loading of pollutants, from an existing source or from new facilities to receiving waters. As noted above, the proposed improvements to Jefferson's sanitary sewer system are not designed to facilitate future population growth in or around the village, but rather to address the village's responsibilities under the Clean Water Act. On this basis, the proposed project will not result in any net increase in the volume of discharge or the loading of pollutants from the village's WWTP permitted to be discharged to Cemetery Creek under Jefferson's National Pollutant Discharge Elimination System (NPDES) permit.

Will not provide capacity to serve a population substantially greater than the existing population. Based on information about the project area's population and its built-out condition provided by the village during planning, this part of Jefferson is not expected to experience substantial population growth over the next twenty years. As such, the purpose of this project is to replace significant parts of the existing sanitary sewer system and not to provide for future growth. On this basis, this criterion has been met.

To conclude, the village's proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. The planning activities for the proposed project identified no potentially significant, direct, indirect, or cumulative adverse impacts. The proposed project is expected to have no short- or long-term adverse impacts on the quality of the human environment or on sensitive resources such as air quality, wetlands, aquifer recharge areas, archaeologically or historically significant sites, prime farmland and other agricultural areas, or threatened or endangered species. Rather, Jefferson's proposed project will enable the village to continue to address its responsibilities under the Clean Water Act.

Contact information

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