



August 8, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Hillsboro – Highland County
Infrastructure Reconstruction Project West Beech Street Area
Loan number: CS390450-0024**

The attached Limited Environmental Review (LER) is for a wastewater improvements project in Hillsboro 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 projects, their 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. The project's relatively narrow scope and lack of environmental impacts qualifies it for an 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,

A handwritten signature in black ink, appearing to read "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Infrastructure Reconstruction Project West Beech Street Area

Applicant: City of Hillsboro
130 North High Street
Hillsboro, Ohio 45133

Loan Number: CS390450-0024

Project Summary

The City of Hillsboro, in Highland County, has requested \$2.78 million from the Ohio Water Pollution Control Loan Fund (WPCLF) to fund the Infrastructure Reconstruction Project West Beech Street Area. This project will involve replacement of sanitary sewers along Beech Street and streets adjacent to Beech Street as shown in Figure 1.

History & Existing Conditions

Hillsboro owns and operates its own wastewater treatment plant, storm sewers, and sanitary sewer system and treats about 1.5 million gallons of wastewater per day (mgd) for approximately 6,535 people within the city. Hillsboro's wastewater is discharged to Clear Creek, an exceptional warmwater habitat stream. The village's wastewater's collection system consists of about 32.8 miles (173,000 linear feet) of sanitary sewers which convey flows north to its wastewater treatment plant (WWTP) located near Clear Creek. While the city's WWTP can handle an average of 1.5 million mgd under average dry weather flow conditions, Hillsboro's water treatment plant (WTP) produces about 800,000 gallons of water daily. The differences between these figures suggest a significant I/I¹ source is present in the collection system. There is significant flooding in the project area during storm events.

Project Description

As shown in Figure 1 below, Hillsboro's Beech Street area infrastructure reconstruction project entails replacing 2,025 linear feet (LF) of eight-inch sanitary sewer as well as 1,150 LF of six-inch sanitary sewer mains, eight manholes, roughly 2,650 LF of 12- to 36-inch diameter storm sewers, and 22 catch basins.

In addition to the proposed sanitary sewers, the overall project includes installing 700 LF of 8-inch and 2,380 LF of 6-inch water main while replacing 34 service lines, seven hydrants, and one flush

¹ Infiltration/Inflow (I/I) is defined as extraneous, clear water that enters a sanitary sewer system through surface or subsurface locations. Inflow may include clear water entering the system through manhole covers, roof or foundation drains, direct storm sewer connections, etc. 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.

hydrant. However, this project will be subject to a separate environmental review and a loan from Ohio EPA's Water Supply Revolving Loan Account (WSRLA).

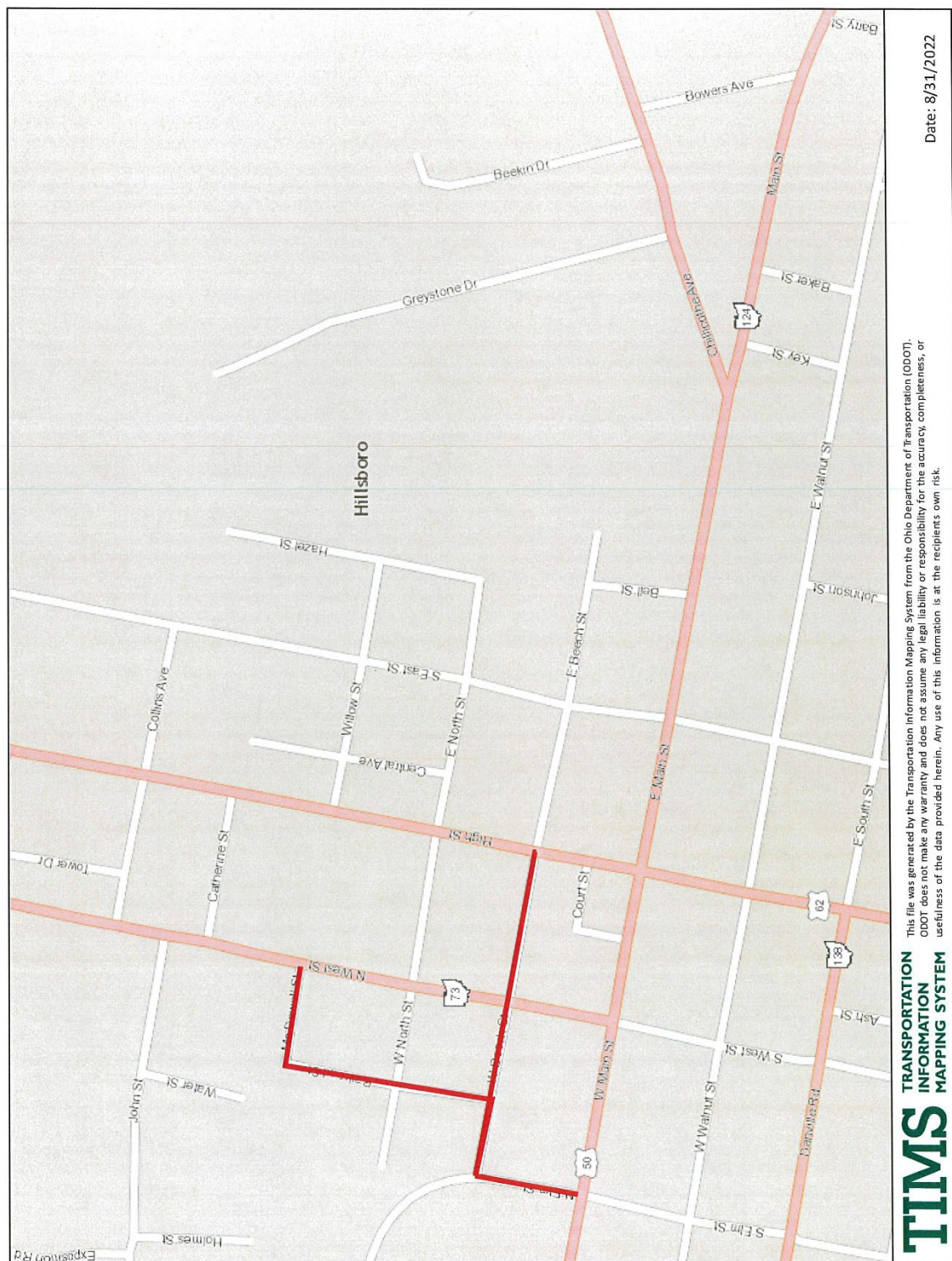


Figure 1. Proposed Beech Street Sanitary Sewer Improvements

Implementation

Hillsboro proposes to borrow \$2.78 million from the Ohio WPCLF at the hardship rate of 1 percent (interest rates are set monthly and may change for the requested October 2023 award date) to cover the cost of the proposed project. Borrowing WPCLF funds at this rate could save Hillsboro approximately \$1.67 million over a 30-year loan period compared to the current market rate of 4.16 percent.

The debt associated with these two construction projects will be recovered from user charges. Hillsboro last increased their sanitary sewer rate in 2018. Assuming no sanitary sewer rate increases to accompany the water rate increases, the average annual sanitary sewer bill for residents served by Hillsboro will be \$938 upon completion of these projects. This is 2.5 percent of the median household income for Hillsboro (MHI; \$37,000) and is \$241 above the Ohio average bill of \$697.

Construction is expected to begin following loan awards and be completed in five months for the Beech Street projects.

Public Participation

Hillsboro has discussed sanitary sewer system issues at city council meetings and in the local newspaper over the past several years to keep residents informed of the need to continue replacing antiquated system components to provide safe and reliable sanitary sewer service into the future. Ohio EPA is unaware of controversy about or opposition to these projects. Ohio EPA will make a copy of this document available to the public on the following webpage and will provide it upon request: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements>.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, they it is for an action within an existing sanitary sewer collection system, which involves the replacement of and improvements to existing sanitary sewers. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect, will have no effect on high-value environmental resources, and will require no specific impact mitigation. All proposed sanitary sewer main replacements will take place within sidewalks and lawn strips. All areas of construction have previously undergone ground disturbances and lack suitable habitat for state and federally listed endangered and threatened species. Construction will not take place within or otherwise impact designated floodplain zones and aquatic habitat. All disturbed areas will be returned to preconstruction conditions. The contractor will be responsible for implementing standard construction best management practices to control noise, dust, and erosion, and to maintain traffic during construction.

The southern end of the proposed sanitary sewer replacements, at the intersection of High Street and West Main Street, will extend into the Hillsboro Historic Business District. Construction will be restricted to within the paved road and will not impact any of the surrounding buildings. The Ohio State Historic Preservation Office concurred with Ohio EPA's determination that the proposed construction is unlikely to impact important historical and archaeological resources.

Is cost effective. Due to the problems with I/I within sanitary sewers in the project area, a “do nothing” alternative is not viable.

Is not a controversial action. The proposed rate increases are not intended to cover the cost of any one specific project, and user rates still appear to be affordable upon completion of these projects. By using WPCLF below market funding, Hillsboro has minimized the cost to residents for sanitary sewer service.

Does not create a new or relocate an existing discharge to surface or ground waters, does not substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters, and will not provide capacity to serve a population substantially greater than the existing population. This project involves the replacement of sanitary sewer mains within the existing service area and will not otherwise alter Hillsboro’s wastewater systems (collection and treatment).

To conclude, Hillsboro’s proposed project is sufficiently limited in scope and meets all applicable criteria to warrant an LER. The planning review of this project identified no potentially significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources (surface waters, coastal zones, floodplains, wetlands, state-designated scenic and recreational rivers, prime and unique agriculture lands, aquifer recharge zones, archaeological and historically significant sites, threatened and endangered species, and state and federal wildlife areas). Rather, completion of this project will help minimize sanitary sewer overflows by reducing the amount of I/I in the city’s collection system.

Contact Information

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