



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

**April 14, 2020**

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

**Sandusky County  
Wightmans Grove Sanitary Sewer and Treatment  
Loan Number: CS390073-0020**

The attached Environmental Assessment (EA) is for a sewer infrastructure improvement project in unincorporated Wightmans Grove 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 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, Sandusky 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: Sandusky County – Wightmans Grove Sanitary Sewer and Treatment

Applicant: Theresa Garcia  
Sandusky County Administrator  
622 Croghan Street  
Fremont, OH 43420

Loan Number: CS390073-0020

### **Project Summary**

The Board of Commissioners of Sandusky County (Sandusky County) has requested approximately \$1,918,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) to construct sanitary sewers and a wastewater treatment plant in the vicinity of unincorporated Wightmans Grove. This project will eliminate failing household sewage treatment systems (HSTS) and the human health threat of sewage in area streams and ditches.

### **History & Existing Conditions**

Wightmans Grove is a community of approximately 75 homes on the south bank of the Sandusky River in Riley Township, near the river's outlet in Sandusky Bay. The community is served by individual household sewage treatment systems (HSTS) that discharge directly or indirectly to area streams, ditches, or the Sandusky River. The Wightmans Grove area is designated a "Critical Sewage Area" (CSA) in the 2019 Toledo Metropolitan Area Council of Governments "Areawide Water Quality Management Plan." Soils in the project area are level, very poorly drained, subject to flooding, and very poorly suited for on-site sewage disposal. Complaints about failing HSTS led the Sandusky County Board of Health in 2003 to declare the presence of unsanitary conditions. Sampling in 2004 determined the presence of fecal coliform bacteria exceeding water quality standards in area streams and ditches. In 2007, Ohio EPA filed Director's Final Findings and Orders requiring installation of sanitary sewers with wastewater treatment and elimination of the HSTS.

The Sandusky River adjacent to Wightmans Grove and Bark Creek, which flows north through eastern Fremont and into the Sandusky near Wightman's Grove in Riley Township, are designated "warmwater habitat" (WWH) streams in the Ohio Water Quality Standards. The most recent Ohio EPA water quality monitoring data show the Sandusky River in the greater project area to be out of attainment for the WWH criteria. Part of the impairment is attributed to sewage discharges in unsewered areas.

Bark Creek is impaired by nutrients and sediment from urban and industrial storm water, failing HSTS, and agriculture.

## **Population Projections**

The population of Sandusky County increased regularly for more than a century until the 1980s and has steadily declined from 1990 on. The population trend is unlikely to reverse in the foreseeable future. The population of the Wightmans Grove planning area is likewise expected to be stable or decline, although sanitary sewers often increase property values and the potential for modest growth in the project area.

## **Alternatives**

Sandusky County's 2010 Comprehensive General Plan for Water and Sanitary Sewer evaluated Wightman's Grove sewer alternatives, selecting conventional gravity sewers and a non-aerated controlled discharge lagoon treatment plant. The 2015 updated plan selected as the preferred alternative for Wightmans Grove conventional gravity sewers and a package extended-aeration treatment plant with user costs under \$100 per month.

## **Selected Alternative**

Sandusky County selected a gravity sewer system in Wightmans Grove with a pump station and force main to move the sewage south to the location of the proposed extended aeration wastewater treatment plant (WWTP) (Figure 1).

The project involves installing approximately 5,420 linear feet (LF) of gravity sanitary sewers primarily in public rights-of-way, approximately 869 LF of gravity laterals (the pipe from the sewer to the property line), approximately 8,838 LF of forcemain (by directional boring, which minimizes surface disturbance), and a pumping station just outside of Wightmans Grove.

The proposed precast concrete extended aeration WWTP, with average daily flow capacity of 30,000 gallons per day (GPD) and peak flow 66,600 GPD, includes a trash trap, flow equalization, aeration tanks, flow splitter, clarifiers, activated sludge return, scum removal, sludge wasting, fixed filter media, sand filters, ultraviolet light disinfection, aerated sludge holding and dewatering, and a new outfall. The effluent will discharge to Bark Creek.

## **Implementation**

Sandusky County will combine \$1,918,000 from the Ohio WPCLF with \$750,000 from the Community Development Block Grant (CDBG) program to finance this construction project. Sandusky County is eligible for a 0% "Hardship" interest rate, 20-year WPCLF loan and will save approximately \$467,000 by using WPCLF subsidized financing compared to a market rate loan at 2.17%.

Assuming loan award in mid-2020, construction should be complete by the end of 2021.

## **Public Participation**

This project has been developing for several years and has been the subject of local news articles and ongoing discussion at regular meetings of the Board of Commissioners of Sandusky County. Ohio EPA is unaware of significant controversy about or opposition to the project.

This document will be available at <https://www.epa.state.oh.us/defa/ofa#169638769-wpclf-documents-for-review-and-comment> and will be made available upon request.

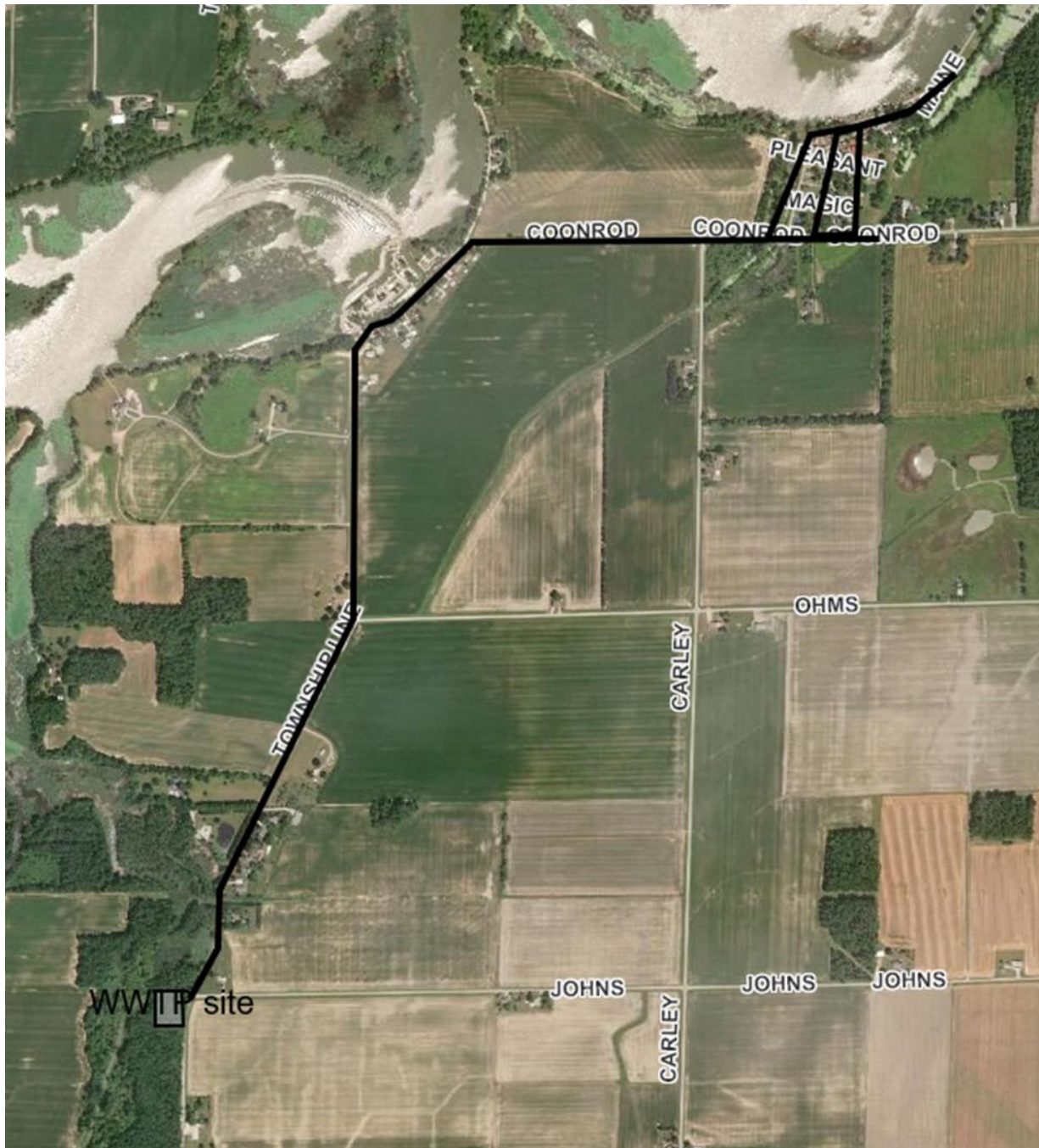


Figure 1 - Project Location

## **Environmental Impacts**

This project could directly affect environmental features. Because the project is designed to serve the existing population of Wightmans Grove rather than provide additional capacity in the wastewater system for growth, the project is not expected to lead to new development or associated indirect or cumulative impacts.

Construction and operation of the sanitary sewer system and WWTP will have no significant impact on coastal zones, Wild and Scenic Rivers, fish and wildlife, endangered species, important terrestrial habitat, farmland and land use, ground water resources, or safe drinking water because the project location is distant from these designations, no important endangered species or habitat will be disturbed by construction, no farmland will be converted to other uses, and no deep excavation that could affect private wells is anticipated.

Construction of the WWTP will affect a small area of jurisdictional wetland, for which the appropriate permit from the U.S. Army Corps of Engineers has been acquired. Construction in that area will have a minimal impact on that aquatic habitat.

Bark Creek, as a surface water resource, will be affected by the new discharge from the proposed WWTP. Ohio EPA determined that the proposed discharge will increase pollutant loadings in Bark Creek necessary to accommodate important public health improvements expected from the elimination of failing HSTS. The proposed project was reviewed under the Ohio Antidegradation Rule that involved a public comment period. No public comments were received during the public notice period and the new wastewater treatment plant discharge permit and Permit to Install were issued in 2019.

Part of the project area is in the Sandusky River regulatory (“100-year”) floodplain. The county floodplain administrator has issued the appropriate permit for the project, ensuring that the project complies with the National Flood Insurance Program requirements.

The Ohio Historic Preservation Office concurred with a federal review determination that this project will not cause a significant adverse effect to properties listed or eligible for listing in the National Register of Historic Places (archaeological and historical resources). In the event of archaeological finds during construction, Ohio Revised Code Section 149.53 requires contractors and subcontractors to notify the Ohio Historic Preservation Office of any archaeological discoveries in the project area, and to cooperate with the Office in archaeological and historic surveys and salvage efforts when appropriate. Work will not resume until a survey of the find and a determination of its value and effect has been made, and Ohio EPA authorizes work to continue.

Construction noise from excavators and trucks will be evident in the immediate construction areas. Contractors are required to limit work to daytime hours and to maintain equipment to minimize noise. Traffic will be temporarily affected while construction occurs in roads and rights-of-way; the impact will be minimized by adherence to routine construction maintenance of traffic measures including signs, flaggers, barricades and detours. Public safety will be ensured by traffic controls and by ensuring trenches are closed or covered during non-work hours. Local aesthetics will be improved with the elimination of odors from failing HSTS; otherwise, after construction is complete and disturbed areas are restored, local aesthetics will be largely unchanged from pre-construction conditions.

The proposed pump station and WWTP will require electrical energy to operate. That energy demand will not affect the local or regional energy supply because the additional demand is readily available on the electrical grid. The additional energy demand will have no significant effect on local or regional air quality; an emergency generator will temporarily increase local air pollution when operating, similar to that from diesel trucks regularly transiting the area.

The typical residential annual sewer bill for the new sanitary sewer customers will be approximately \$1,284, which is approximately 3.9% of local median household income (MHI; \$49,032). A sewer bill less than 1.8% of MHI is typically considered affordable. The Ohio average annual residential sewer bill is \$715, which is 1.1% of state MHI (\$54,533). Besides the new sewer bill, each property owner is responsible for the cost of constructing the sanitary lateral between the building and the new sewer and the cost of abandoning the existing septic tank. Sandusky County estimates this “on-lot cost” will range from \$1,700 to \$2,400.

By using the WPCLF low-interest financing and the CDBG funds for this project, Sandusky County has minimized the cost and the economic impact on residents and the local economy.

### **Conclusion**

Based on its review of general plans, detail plans, and other information collected about this project, Ohio EPA concludes that no significant short-term or long-term adverse direct environmental impacts will result from the project as related to the environmental features discussed in this Environmental Assessment. This is because either these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts of construction will be temporary and mitigated.

This project equally serves the entire Wightmans Grove community, so no particular segment of the community will be faced with additional adverse impacts or be deprived of environmental benefits, compared to any other segment.

Because this project will serve existing needs rather than provide capacity for speculative growth, this project, alone or in combination with other projects, is not expected to result in any significant indirect or cumulative short-term or long-term adverse environmental impacts.

Ohio EPA expects the economic impact of the project on the average user will be acceptable because Sandusky County has received a favorable financing package that minimizes the cost.

The project is expected to eliminate the potential human health threat of failing HSTS.

### **Contact information**

For more information, please contact:

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