



**January 29, 2024**

**Limited Environmental Review and Finding of No Significant Impact**

**City of Hubbard – Trumbull County  
2023 Water Line Replacement Project  
Loan number: FS390460-0015**

The attached Limited Environmental Review (LER) is for a drinking water distribution project in Hubbard which the Ohio Environmental Protection Agency intends to finance through its Water Supply Revolving Loan Account (WSRLA) 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 WSRLA 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,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

# LIMITED ENVIRONMENTAL REVIEW

## **Project Identification**

Project: 2023 Water Line Replacement Project

Applicant: City of Hubbard  
220 West Liberty Street  
Hubbard, Ohio 44425

Loan Number: FS390460-0015

## **Project Summary**

The City of Hubbard requested \$526,282 from Ohio’s Water Supply Revolving Loan Account (WSRLA) for the 2023 Water Line Replacement project, which will replace two failing water lines on Caroline Avenue and Rebecca Avenue and lead service lines. Due to the nature of the project, environmental impacts will be minimal.

## **History & Existing Conditions**

The city of Hubbard, located in Trumbull County (see Figure 1) owns, operates, and maintains its own drinking water distribution system and has recently focused on the reconstruction of and major infrastructure repairs to its 80-year-old water lines. The city is currently engaged in projects for looping dead-end water lines, city-wide leak detection surveys, and other means of improving water clarity and quality. Hubbard purchases water wholesale from Aqua Pennsylvania, nearly 800,000 gallons per day for its 7,525 residents.

The 6-inch water lines on Caroline and Rebecca avenues are aged and require frequent maintenance due to the high number of breaks in recent years. These lines service approximately 118 residential structures, or 271 people. Due to the age of the distribution system, lead service lines (LSLs) could be present.



**Figure 1. Trumbull County**

## **Project Description**

The proposed project will replace around 5,000 linear feet of existing 6-inch water line on Caroline and Rebecca avenues from Myron Street in the north to West Liberty Street in the south (see Figure 2) with new 6-inch PVC pipe. Fire hydrants will also be replaced. Known lead service lines (LSLs) on both the public and private sides will be replaced. The city will replace all LSLs identified during construction, or, provide water filtration until the time the LSLs can be replaced.

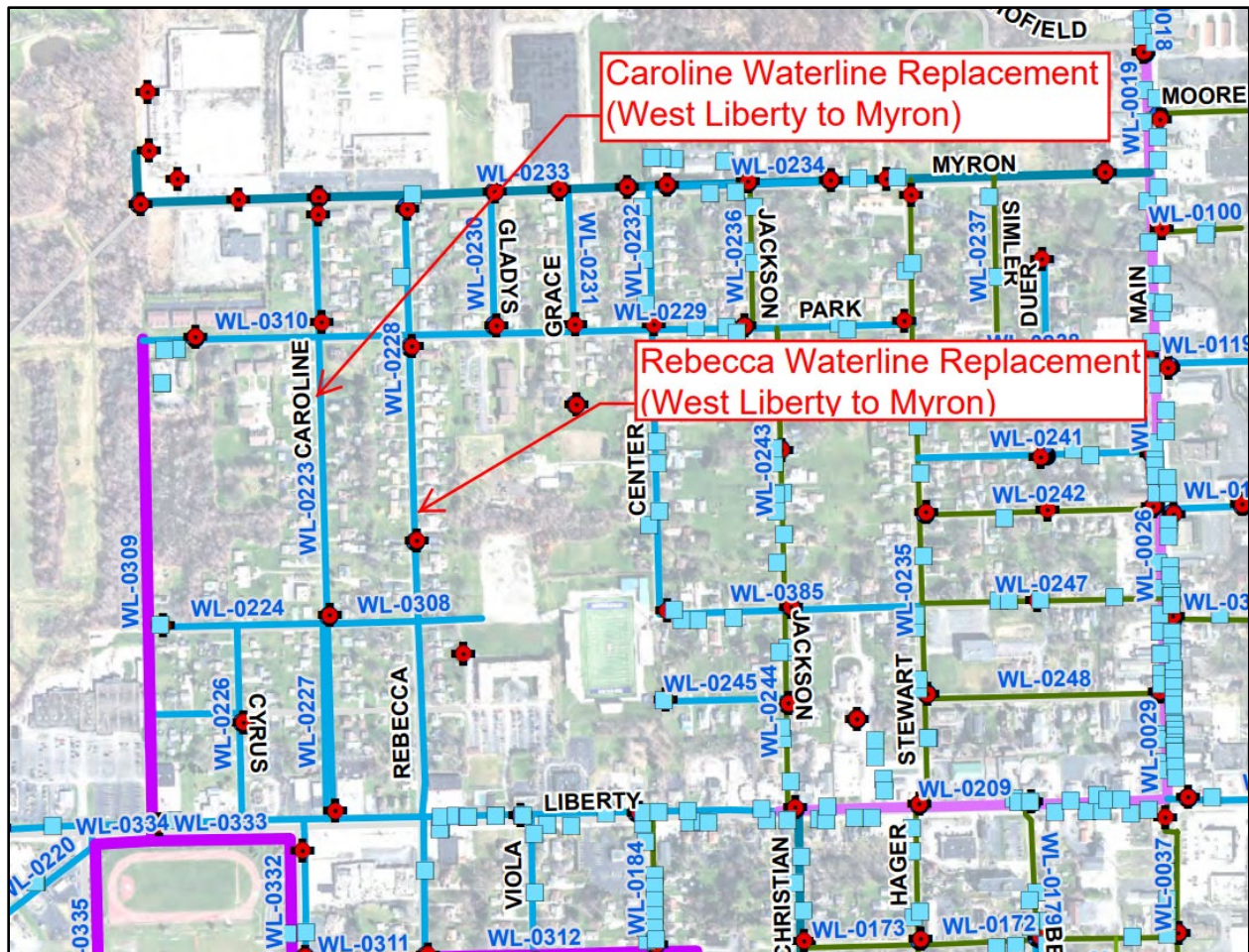


Figure 2. Hubbard project area

## **Implementation**

Hubbard requested \$526,282 from the WSRLA for project, at the small community rate of 2.58%. The small community rate is set monthly and may change for a later loan award. In addition, the city will use \$750,000 of committed American Rescue Plan Act (ARPA) funds and a small portion of state infrastructure grant.

Eight percent annual rate increases are planned for the next four years, not tied to this specific project. Under the 2024 rate, the city estimates that the average annual residential water bill will be \$497, which is 1% of the median household income (\$52,227). This is only slightly higher than the average annual Ohio water bill of \$477. The anticipated loan award is in February 2024; construction is expected to begin soon after and last about three months.

## **Public Participation**

This project has been discussed at city council meetings and is part of the water department's Asset Management Plan. The contractor will distribute door hangers to affected residents prior to the start of construction, and customers will be notified at least 48 hours prior to any disruptions in service.

Access to private property will be arranged with the property owner in the event that the private side service line contains lead.

Ohio EPA is unaware of controversy about or opposition to this project. 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/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>.

### **Conclusion**

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing drinking water distribution system, which involves the functional replacement of and improvements to existing mechanical equipment. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

**Will have no significant environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources.** Construction will be done in the existing right-of-way and in lawns of developed residential areas that lack important environmental resources. Any impacts will be minimal to non-existent. No tree removal is expected.

**Is cost effective** because the replacement of failing water lines has lower life-cycle cost than continued repair, and there is no alternative to replacing LSLs.

**Is not a controversial action** because residents have been properly informed of the upcoming work and neither Hubbard nor Ohio EPA is aware of controversy about or opposition to this project.

**Does not create a new, or relocate an existing discharge to surface or ground waters, does not create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing water source, or substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters** since the project is merely replacing existing infrastructure components.

**Will not provide capacity to serve a population substantially greater than the existing population** because the project is only replacing existing infrastructure components and no new services will be installed.

Based upon Ohio EPA's review of the planning information and the materials presented in this Limited Environmental Review, 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.

As a result of this project, residents of Caroline Avenue and Rebecca Avenue will have more reliable drinking water and the removed threat of LSLs.

**Contact Information**

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