June 18, 2019

Limited Environmental Review and Finding of No Significant Impact

City of Columbus – Franklin County
2018 Annual Lining Contract
Loan number: CS390274-0270

The attached Limited Environmental Review (LER) is for sanitary sewer rehabilitation project in Columbus 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, as described in Ohio Administrative Code (OAC) 3745-150-05.

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, as described in OAC 3745-150-06. 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,

[Signature]
Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment
LIMITED ENVIRONMENTAL REVIEW

Project Identification

Name: Columbus – 2018 Annual Lining Contract

Applicant: Melissa Tucker, Loans and Grants Manager
City of Columbus
910 Dublin Road
Columbus, OH 43215

Loan Number: CS390274-0270

Project Summary

The City of Columbus in Franklin County has requested $5,000,000 from the Water Pollution Control Loan Fund (WPCLF) for ongoing annual rehabilitation of existing sanitary/combined sewers and manholes. The project is intended to reduce discharges to the Scioto and Olentangy Rivers.

History and Existing Conditions

Columbus has combined sewers (pipes that in dry weather carry sanitary sewage only, and during wet weather carry sanitary flows combined with storm drainage). When flows rise dramatically during and after rainfall, combined sewer overflows (CSOs) divert untreated sanitary sewage mixed with storm water to area streams. Such discharges pose a threat to human health and the environment.

Inflow and infiltration (I/I) contribute to CSOs in Columbus. Inflow is surface runoff that enters sanitary sewers through directly connected downspouts, area drains, etc. Infiltration is the ground water that seeps into sanitary sewers through cracks, offset joints, and other flaws in the pipe. Columbus is under a federal consent decree to reduce CSOs and maintains annual rehabilitation of combined sewers contributing to current CSO conditions.

Sanitary sewers are televised by the Columbus Sewer Maintenance Operation Center to perform I/I studies. While the sewer is being televised, structural issues (cracks, fractures, holes, collapses, etc.) and maintenance issues (roots, inflow, deposits, etc.) are coded and recorded by the Pipeline Assessment Certification Program (PACP). With the aid of a sewer condition assessment tool, the sewers are prioritized to determine which segments will be included in the Annual Lining Contract.

Project Description

The project will rehabilitate existing sanitary/combined sewers utilizing cured-in-place pipe (CIPP) methods and rehabilitate existing sanitary/combined manholes by cementitious lining. A list of identified sewer sections to be rehabilitated throughout various locations of Columbus was created from previous I/I studies. Sewers in poor condition will be rehabilitated to correct numerous cracks, fractures, offset joints, and holes that allow for I/I. The final results of this project will reduce I/I in Columbus’ sanitary/combined sewer systems. This improvement will reduce overflows and therefore...
reduce the biological and toxic pollutants entering the Scioto and Olentangy Rivers. Both rivers are currently designated as Warmwater Habitat (WWH) Aquatic Life Use in Ohio Water Quality Standards. Removal of this discharge could contribute to maintaining water quality.

The construction footprint for this project will remain within the confines of the existing sanitary sewer lines, therefore minimizing effects on environmental resources. No tree clearing will occur as a result of this project and aquatic habitat will not be impacted. The contractor is responsible for best management practices to control erosion and sedimentation and maintain local traffic during construction.

Maps of the project vicinity are provided in the exhibits below.

**Implementation**

**Project Costs**
Columbus plans to borrow $5,000,000 from the WPCLF. During the 20-year loan period Columbus will save approximately $734,257 by using WPCLF dollars at the Standard Long Term rate of 1.66%, compared to the market rate of 2.91%.

**Local Economy**
The current Columbus residential sewer bill is approximately $568/year. Projected residential sewer bills with the implementation of this project are expected to increase to approximately $646/year, which is approximately 1.4% of the median household income (MHI) of Columbus, $45,659. A sewer bill less than 1.8% of MHI is typically considered affordable. The Ohio average residential sewer bill of $655 is 1.2% of state MHI ($53,301).

By using WPCLF financing for this project, Columbus has minimized the economic impact on customers.

**Project Schedule**
The anticipated loan award will occur in July 2019. Construction is expected to begin immediately and the project is expected to be completed by January 2021.

**Public Participation**
A public notice was posted on the City of Columbus' Public Utilities webpage detailing the proposed project and contact information is provided for any public questions or concerns.

Reviews of the respective environmental resources were completed by Ohio EPA, Division of Environmental and Financial Assistance. The review agency does not oppose the project.

Ohio EPA will make a copy of this document available to the public on its web page: [http://epa.ohio.gov/defa/ofa.aspx](http://epa.ohio.gov/defa/ofa.aspx) (Under the “What’s New” tab, scroll to: “Documents Available for Review and Comment – WPCLF Documents for Review and Comment”) and will provide it upon request to interested parties. Information supporting this Limited Environmental Review (LER) is available from the project contact named below.

**Conclusion**
The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater treatment system, which involves the functional rehabilitation of and improvements to existing equipment. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

- **Has no significant environmental effect, no effect on high value environmental resources, and does not require extensive specific impact mitigation.**
  All project work will occur within the footprint of the existing sewer lines within rights-of-way in highly urbanized areas. Standard construction best management practices are required to control dust, erosion and sediment runoff, noise, and maintain safety. Appropriate traffic controls will help minimize traffic disruption during work in and along roads. Construction work is not to interfere with aquatic habitat or require tree clearing.

- **Is cost effective and not controversial.**
  The proposed project is cost-effective as it involves the necessary rehabilitation of sewer lines to allow for more efficient operation. This project will decrease combined sewer overflows by targeting sewers that have been identified as having structural and maintenance issues. Rehabilitating sewers using CIPP lining methods is a cost-effective alternative compared to open cut sewer replacement and is much less disruptive to residents, motorists, and the environment. DEFA is unaware of any specific opposition to or controversy about this project that will improve the efficiency of the city's sewer system and decrease discharges to the Scioto and Olentangy Rivers.

- **Does not create a new, or relocate an existing, discharge to surface or ground waters; 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; and will not provide capacity to serve a population substantially greater than the existing population.**
  This project involves the routine rehabilitation of sewer lines and does not otherwise alter Columbus' sewer system. It has no effect on wastewater discharge amounts or locations, or on any other potential source of pollutants. This project will not increase the city's present sewer system capacity, nor facilitate an expansion of service.

Based upon the available planning information for this project and the materials presented within this LER, Ohio EPA concludes that the proposed project will not result in any significant adverse impacts to any environmental features. The project is expected to have no significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources such as surface waters, coastal zones, riparian areas, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species.

This project will help reduce inflow and infiltration in Columbus' sanitary/combined sewer systems to improve efficiency and reduce overflows potentially contaminating local rivers.

**Contact**
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Columbus, OH 43216-1049
Exhibit 2: Project Location Map