



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

February 22, 2016

Notice of Issuance of a Limited Environmental Review and Final
Finding of No Significant Impact to All Interested Citizens,
Organizations and Government Agencies

City of Columbus
Columbus Department of Public Utilities
Blueprint Hilltop Lining Project (CIP 650875-100002)
CS390274-0216

The purpose of this notice is to advise the public that Ohio EPA has reviewed the referenced project and finds that neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to complete the environmental review of the project. Instead, this project meets the criteria for a Limited Environmental Review (LER). These criteria are summarized below in this document and in the attached LER.

This project involves the rehabilitation of existing sanitary sewers within the Blueprint Hilltop project area utilizing cured-in-place-pipe (CIPP) methods and rehabilitating existing sanitary manholes by cementitious lining. This project is part of Blueprint Columbus which is an initiative to help address the 2002 sanitary sewer overflows and the 2004 combined sewer overflow consent orders issued by Ohio EPA. The project will benefit the Columbus area by reducing the amount of inflow and infiltration of non-sewerage waters to the sanitary sewer system, thereby reducing the occurrences of water in basements and sewerage overflows to streams and rivers.

The LER was completed for this project as it will not individually, cumulatively over time or in conjunction with other Federal, State local or private actions have a significant adverse effect on the quality of the human environment. Consequently, a finding of no significant impact (FONSI) can be issued now for this project.

The Water Pollution Control Loan Fund (WPCLF) program required the inclusion of environmental factors in the decision-making process for project approval. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed action in its review and approval process. Environmental information was developed as part of the facilities planning process. A subsequent review by this Agency has found that the proposed action does not require the preparation of a EA or an SS.

Our environmental review concluded that because the proposed project is limited in scope and meets all applicable criteria, an LER is warranted. Furthermore, the proposed project:

- Has no significant environmental effect;
- Does not require extensive specific impact mitigation;
- Has no effect on high value environmental resources;
- Is cost effective;
- Is not a controversial action;
- 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.

A map depicting the location of the project is included as part of the LER. The LER presents information on the proposed project, its costs and the basis for our decision. Further information can be obtained by calling or writing the contact person listed on the back of the LER.

Upon issuance of this determination, a loan award may proceed without being subject to further environmental review or public comment, unless information is provided which determines that environmental conditions for the proposed project have changed significantly.

Sincerely,



Jerry Rouch, Assistant Chief
Office of Financial Assistance
Division of Environmental and Financial Assistance
Ohio EPA

Attachment

Cc: Amy Walkenspaw, DEFA-OFA, PCU
Ryan Laake, DEFA-OFA, EEU
Melissa Tucker, Loans and Grants Manager, Columbus Department of Public Utilities
Ken Heigel, OWDA
File

LIMITED ENVIRONMENTAL REVIEW

A. Project Identification

Name: City of Columbus

Address: Tracie Davies, Director
Department of Public Utilities
910 Dublin Road
Columbus, Ohio 43215

Project: Blueprint Hilltop Lining Project, AIMS ID: 6128, CS390274-0216
(CIP No. 650875-100002),

B. Existing Need

The City of Columbus – Department of Public Utilities – Division of Power and Water (Columbus DPOW) has applied to Ohio EPA's Water Pollution Control Loan Fund (WPCLF) for low-interest financing of the Blueprint Hilltop Lining project to rehabilitate existing sanitary sewers with cured-in-place pipe (CIPP) and rehabilitate existing manholes with cementitious lining. This project is part of Blueprint Columbus which is an initiative to help address the 2002 sanitary sewer overflows (SSO) and the 2004 combined sewer overflow (CSO) consent orders issued by Ohio EPA. The WPCLF program requires an environmental review as part of the loan award decision-making process. This document summarizes Ohio EPA's environmental review of the proposed Blueprint Hilltop Lining project.

Columbus completed a system evaluation and capacity assurance plan (SECAP) in response to the SSO consent order to address sanitary sewer overflows (SSOs) and basement back-ups (water in basements, or WIBs). Columbus developed a long term control plan (LTCP) in response to the CSO consent order to address combined sewer overflows (CSOs). Then in 2005, the City submitted a wet weather management plan (WWMP) to Ohio EPA which combined the previous two plans (SECAP and LTCP) and was intended to address all wet weather overflows. By 2010, the City had invested over a billion dollars toward projects addressing its wet weather overflows and had obtained a substantial reduction in CSO volumes.

In August 2012, the City approached Ohio EPA about re-evaluating the WWMP so that it could explore integrated planning. The purpose of integrated planning is to determine the feasibility of solving the City's SSO and WIB issues by removing inflow and infiltration (I/I) from the system instead of continuing to allow I/I into the system and then transporting and treating it. The new approach is now referred to as "Blueprint Columbus."

The Blueprint Columbus plan (September 15, 2015) is a multi-pronged approach aimed at mitigating SSOs, basement back-ups or WIBs, CSOs and improving stormwater quality prior to discharging it to area streams. The first work to be completed in a Blueprint project area is the rehabilitation of existing sanitary sewers.

The cause of SSOs and WIBs is I/I entering the separate sanitary sewers, including private lateral service connections, coupled with insufficient hydraulic capacity to transport it to treatment without overflows. The city has been studying I/I for years and has determined that the majority of it is entering the system from older residential areas. The SSOs and WIBs will be addressed

by removing I/I from the sanitary sewer system, allowing that system to function properly with fewer overflows or back-ups. The I/I removal will be accomplished by three technologies involved in Blueprint: rehabilitating sewer pipes (city owned and private laterals), redirection of roof water away from houses to protect the foundation drain and a voluntary sump pump program. Stormwater quality is addressed by a fourth technology: green infrastructure, which includes rain gardens and porous pavement. The city refers to these components as the four pillars.

The entire Blueprint Hilltop area is located in west-central Columbus, including 3,302.5 acres within city boundaries. The basin is bordered on all sides by the road system: interstate I-70 to the north and northeast, Harrisburg Pike to the southeast, Clime Road to the south and interstate I-270 to the west. The area is crossed by US 40 and railroad tracks from west to east, and by US 62 from south to east.

There are three main interceptors in the Hilltop area. The west side sanitary sewer and west side relief sewer run west to east in the lower portion of the Blueprint area. On the south side, the Big Run trunk sewer conveys flow from the west side of the City to the north-south Scioto main trunk sewer. The Hilltop sanitary system receives flow from two combined sewer areas : one in Franklin County that extends upstream from the west boundary of the Blueprint area, the other in the city of Valley View in the northeast corner of the basin. The sanitary flow leaving the Blueprint area from the east is conveyed to the west side trunk sewers. Both of the trunks discharge into the north-south Scioto main trunk sewer, which conveys flow to the Jackson Pike Wastewater Treatment Plant. The sanitary flow leaving the Blueprint area from the south discharges into the Big Run trunk sewer, which conveys flow to the interconnecting trunk sewer, then to the Southerly Wastewater Treatment Plant.

The project includes over 100,000 linear feet of 8-inch to 30-inch diameter sewers and over 500 manholes.

- Project location overview map (Figure 1),
- Hilltop area project detail map (Figure 2)

The goal of this project is to reduce the amount of inflow and infiltration of non-sewerage waters to the sanitary sewer system thereby reducing occurrences of water in basements and sewerage overflows to area streams and rivers.

The Director of Public Utilities enacted legislation which authorized the City to apply for, accept and enter into up to nineteen WPCLF loan agreements for the financing of up to nineteen Division of Sewage and Drainage construction projects, including the Blueprint Hilltop Lining project, Capital Improvement Project Number (CIP#) 650875-100002.

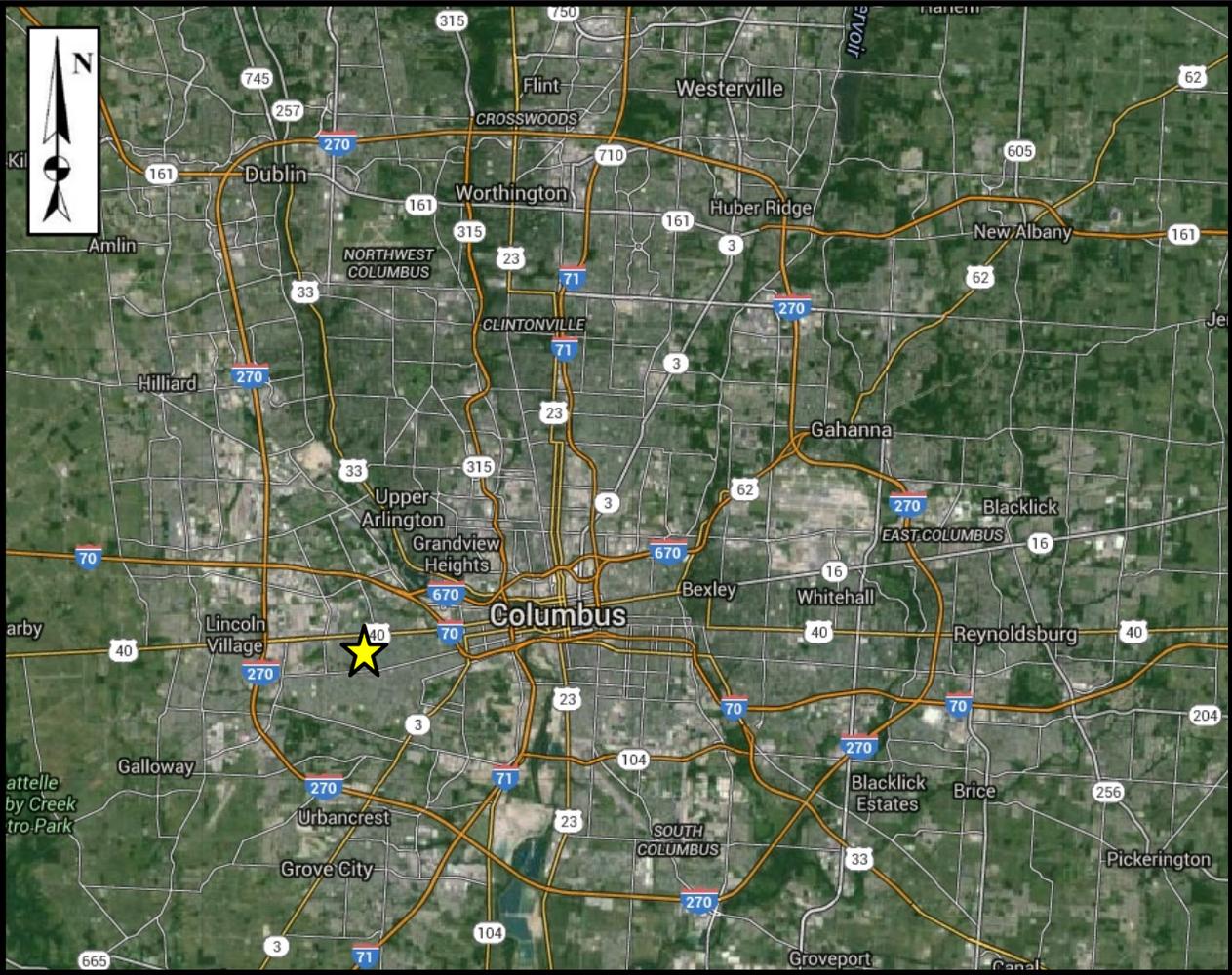


Figure 1. Project Location Overview Map

 Blueprint Hilltop Lining Project Area

C. Project Description

The project includes the rehabilitation of existing sanitary sewer mains and associated manholes in the Blueprint Hilltop project area. The project area is located within the Hilltop planning area and is bounded by West Broad Street on the north, Derrer Road on the west, Sullivant Avenue on the south and Wheatland Avenue on the east. The goal of the project is to reduce the amount of I/I of non-sewerage waters to the sanitary sewer system thereby reducing the occurrences of WIBs and SSOs to area streams and rivers.

The project consists of rehabilitating approximately 109,900 linear feet of 8-inch to 30-inch diameter sewers utilizing the CIPP process, cleaning and televising sewers, manhole rehabilitation and other similar work that may be necessary.

D. Estimated Project Costs

The estimated project cost for the City of Columbus Hilltop Lining project is \$6 million. Columbus qualifies for the WPCLF standard, below-market interest rate, which currently is fixed at 1.85% for a 20-year loan. Compared to the current market rate of 3.04%, a total savings of approximately \$846,000 will be realized by financing through the WPCLF.

The WPCLF loan will be repaid through revenue generated by the Columbus user charge system. The current user charge rates have been in effect since January 1, 2015. Based on the current rates, residential customers using an average of 7,480 gallons per month (3,000 cubic feet per quarter) pay a quarterly bill of \$107.18 or \$428.72 annually. It is not anticipated that the proposed project will necessitate an increase in the user charge. Thus, the average annual expenditure for finished water in Columbus represents 1% of the median household income for a City of Columbus resident (the annual average charge for water service as a percentage of the 2007-2011 American Community Survey 5-Year Estimates), which is generally considered to be affordable.

E. Project Schedule

Construction loan award – March 2016
Project start date – Fall 2016
Completion of Construction – April 2018

F. Public Notification

The City's capital improvements budget and capital improvements plan are posted annually on the City of Columbus' website <https://columbus.gov/Templates/Detail.aspx?id=546>. Project information can also be found on the Columbus Department of Public Utilities website under "projects" <https://www.columbus.gov/Templates/Detail.aspx?id=65269>. Additionally, the City maintains an interactive mapping tool online called "My Neighborhood" <http://myneighborhood.columbus.gov/>. "My Neighborhood" provides City of Columbus residents with quick and easy access to pertinent information about city services and facilities.

The public has the opportunity to review the legislation approving the funds for the project, prior to City Council Meetings, which are held nearly every Monday beginning at 5:00 P.M. in City Hall. All meetings are open to the public. These meetings can be observed in one of three ways:

- By attending the City Council meeting. Those wishing to address City Council at these meetings are welcome to do so.
- On CTV, where local residents subscribing to basic cable television can watch the City Council Meetings live or rebroadcast.
- In streaming video format.

Area residents will receive notifications before construction begins. The notifications will give information on timing of the work, contact information and a request to restrict water usage for the short time (8-10 hours) while sewer main is being CIPP lined.

Ohio EPA will post a copy of this Limited Environmental Review and Finding of No Significant Impact on its website at: epa.ohio.gov/defa/ofa.aspx under the "What's New" tab in the "WSRLA Documents Available for Review and Comment" list. Supporting documentation for the LER decision is also available for public inspection upon request from the contact person listed at the end of this report. No opposition to the project is known at this time.

G. Planning Information

The Division of Environmental and Financial Assistance has reviewed the facilities planning information for the proposed project in consideration of potential direct, indirect and cumulative short- and long-term environmental impacts and has found that no adverse impacts will occur as a result of project construction and operation.

H. Application of Limited Environmental Review Criteria

Ohio EPA conducts environmental reviews of all projects prior to WPCLF financing through the State Environmental Review Process (SERP). The SERP contains a special set of review procedures for projects that do not have the potential to "individually, cumulatively over time, or in conjunction with other Federal, State, local, or private actions have a significant adverse effect on the quality of the human environment." Such projects may qualify for a Limited Environmental Review. The proposed project meets the project type criteria for an LER; namely, it involves an action in a sewer community for the minor rehabilitation of existing facilities and for the correction of infiltration and inflow. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

- **will have no significant adverse environmental effect**, since sensitive resources such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, wild, scenic or recreational rivers, or threatened or endangered species or their critical habitats are not present in the project area;
- **does not require extensive specific impact mitigation**, since the proposed project involves the rehabilitation of existing sewers using CIPP lining methods and the rehabilitation of existing sanitary manholes by cementitious lining. Commonly-used construction best management practices will be used and all pre-construction conditions shall be fully restored as close to the original condition as practical;

- **will have no adverse effect on high value environmental resources**, since the project area includes highly developed residential neighborhoods with asphalt roads, manicured lawns, numerous existing utilities and high value environmental resources;
- **is not a controversial action**, since user rates will not be increased as a result of this project, nor are any adverse impacts to environmental resources likely to occur. Furthermore, Ohio EPA is unaware of any public opposition to the project;
- **is cost-effective**, since little to no excavation is involved in this trenchless process, resulting in amore cost-effective and less disruptive method than traditional "dig and replace" pipe repair methods;
- **does not create new, or relocate existing, discharges to surface or ground waters; and 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** since the proposed project does not involve any change in a point source discharge related to the treatment of wastewater or drinking water, where such issues might be of concern; and
- **will not create new sources of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing source; nor will it provide capacity to serve a population substantially greater than the existing population**, since the project scope is limited to repairing existing sewer pipe and not to serving additional demand.

The planning activities for the project have identified no potentially significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources. Implementation of appropriate construction mitigation measures is required by the contract specifications, and construction activity will be limited to the existing, previously-disturbed road rights-of-way. The project will benefit the Columbus area by reducing the amount of inflow and infiltration of non-sewerage waters to the sanitary sewer system, thereby reducing occurrences of water in basements and sewerage overflows to area streams and rivers.

I. Contact Person

For further information, please contact:

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