



May 3, 2024

Limited Environmental Review and Finding of No Significant Impact

**City of Columbus – Franklin County
BP Clintonville 2-Lat Lining Old Beechwood
Loan number: CS390274-0487**

The attached Limited Environmental Review (LER) is for a wastewater conveyance 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.

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. 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: BP Clintonville 2-Lat Lining Old Beechwold

Applicant: City of Columbus
Department of Utilities, 4th Floor
910 Dublin Road
Columbus, Ohio 43215

Loan Number: CS390274-0487



Figure 1. Franklin County

Project Summary

The City of Columbus has requested funding from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the BP Clintonville 2-Lat Lining Old Beechwold project. Work for the project will include lining the sanitary service laterals of homes within the Old Beechwold neighborhood to prevent excess stormwater from entering the city's sanitary sewer system.

History & Existing Conditions

In 2002 and 2004, the City of Columbus entered into two consent decrees with Ohio EPA to eliminate sewage backups into homes and overflows of untreated sewage into rivers during wet weather events. The city submitted its wet weather management plan (WWMP) to Ohio EPA in 2005 to outline how the city planned to meet the compliance criteria established within their U.S. EPA consent decree. The WWMP contained strategies to address the sewer overflows within their sanitary sewer and combined sewer systems. This plan consisted of gray solutions only, including building 28 miles of sewer tunnels and upsizing, lining, and replacing pipes, among others.

Due to the high cost of the proposed improvements, the city explored other alternatives. In 2013, with Ohio EPA approval, the Columbus Division of Sewerage and Drainage (DOSD) developed Blueprint Columbus as its integrated planning approach to address sewer overflows and water-in-basement (WIB) occurrences. The four pillars of Blueprint are sewer lining, roof drain redirection, sump pump installations, and green infrastructure.

Blueprint Columbus consists of 17 study areas, each roughly 1,000 acres in size. Every study area is broken into four to five project areas. Blueprint Columbus seeks to address the root cause of overflows instead of building tunnels to deal with excess flows. Surveys conducted by the city determined that over 50 percent of the inflow and infiltration (I/I) of stormwater in the system can be traced to private sources, mostly in residential neighborhoods. Old Beechwold in the Clintonville area of Columbus is one such neighborhood. The area has separated sanitary and storm sewer systems, but still struggles with I/I.

Project Description

This project consists of lining and rehabilitating sanitary sewer laterals within the Old Beechwood neighborhood in order to reduce I/I. The lining will be accomplished using the cured-in-place-pipe (CIPP) lining method. There are 133 laterals within the project area with an approximate 5,700 linear feet of liner. See Figure 2 below for a map of the project area.

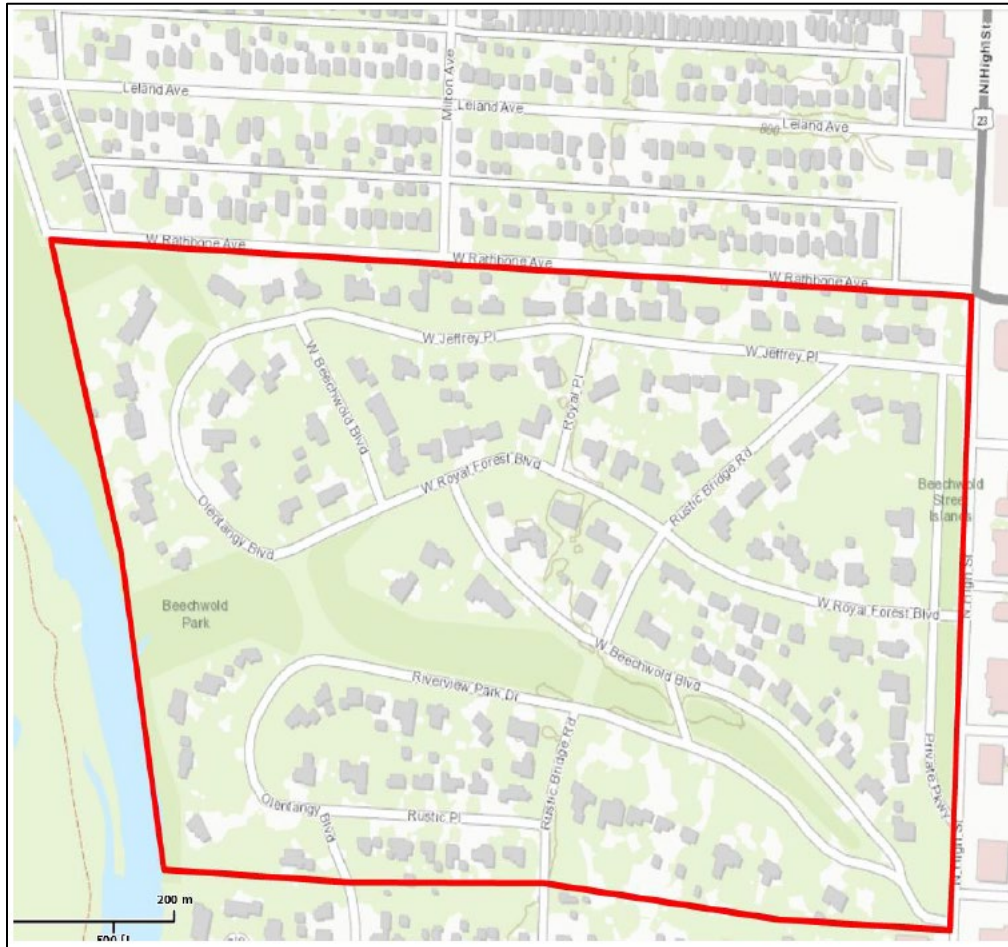


Figure 2. Map of the project area

Implementation

The City of Columbus proposes to borrow approximately \$1.9 million from the Ohio WPCLF at the standard interest rate of 2.60%. WPCLF interest rates are set monthly and may change for a later loan award. Assuming a 20-year loan, borrowing this amount in WPCLF dollars could save Columbus approximately \$263,000 over the life of the loan compared to the current market rate of 3.85%.

Columbus has a 6% sewer rate increase planned for 2024 and 2025. The average annual sewer bill for residents served by Columbus is \$648. This is 1.1% of the median household income (MHI: \$58,575) and is higher than the Ohio average annual sewer bill, \$490. Construction is scheduled to begin in the summer and is scheduled to be completed in approximately six months.

Public Participation

The city has conducted multiple neighborhood association meetings to update residents on the various aspects of the Blueprint process, most recently on January 23rd, 2024. The city has also sent out letters to all affected residents explaining the project.

Ohio EPA is unaware of opposition to or controversy about the project. Ohio EPA will make a copy of this document available to the public on its webpage: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements> and will provide it on request to interested parties.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater collection system, which involves the lining of service laterals. 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 because the nature of lateral lining work is low-impact and the work will be within the previously disturbed residential areas; therefore, areas lacking important environmental features.

Is cost effective and is not a controversial action as lateral lining is a more cost-effective solution compared to complete reconstruction of sewer lines. Ohio EPA is unaware of any opposition to or controversy about the project.

Does not create a new, or relocate an existing, discharge 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 and will not provide capacity to serve a population substantially greater than the existing population because the project merely lines existing sanitary service laterals of homes and does not otherwise alter discharges.

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. This project will reduce flows from the Old Beechwold neighborhood of Clintonville.

Contact Information

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