



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

**October 11, 2022**

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

**City of Columbus – Franklin County  
BP Linden Lateral Lining – Agler/Berrell  
Loan number: CS390274-0413  
BP Linden Lateral Lining – Oakland Park/Medina  
Loan number: CS390274-0415**

The attached Limited Environmental Review (LER) is for two wastewater management projects 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 projects, their 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 projects should not result in significant adverse environmental impacts. This projects' relatively narrow scope and lack of environmental impacts qualifies them 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 projects have changed significantly.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Courtright". The signature is written in a cursive, flowing style.

Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Project 1:      Blueprint Linden Lateral Lining - Agler/Berrell  
                  Loan Number: CS390274-0413

Project 2:      Blueprint Lateral Lining - Oakland Park/Medina  
                  Loan Number: CS390274-0415

Applicant:     City of Columbus  
                  Columbus Department of Public Utilities  
                  910 Dublin Road, 4<sup>th</sup> Floor  
                  Columbus, Ohio 43215

### **Project Summary**

The City of Columbus in Franklin County is requesting the following low-interest loans from the Ohio Water Pollution Control Loan Fund (WPCLF) for two projects in the Linden area to address inflow and infiltration (I/I) issues:

Project 1 (Linden – Agler/Berrell): \$6.9 million to line the sanitary service laterals of homes within the Agler/Berrell project area to prevent excess stormwater from entering the city’s sanitary sewer system.

Project 2 (Linden – Oakland Park/Medina): \$7.7 million to line sanitary sewer service laterals in the Oakland Park/Medina area 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 consent decrees. The WWMP contained strategies to address the sewer overflows within their sanitary sewer and combined sewer systems. This plan consisted of building 28 miles of sewer tunnels and upsizing, lining, and replacing pipes.

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 address sewer overflows and water-in-basement (WIB) events. 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 Linden is one of those 17 study areas and is

comprised of four separate and distinct project areas (Hudson/McGuffey, Oakland Park/Medina, Agler/Berrell, and Artane/Parkwood).

Blueprint Linden's sanitary sewer infrastructure is stressed during wet weather events. The challenges associated with the sanitary sewer systems in the Linden area include the project area's eight designed sewer relief (DSR) points over 850 acres, approximately 660 documented WIB complaints, inadequate storm sewer conveyance capacity, and sanitary sewer deficiencies within the Linden area. Additionally, extraneous clear water entering sanitary sewers through illicit connections to storm sewers or via leaky manholes (inflow) or through cracks in pipes (infiltration) can overflow sewers and cause overflows.

### **Project Description**

The two Linden area projects are being undertaken as part of a systematic approach to address inflow/infiltration (I/I) issues within the City of Columbus.

#### **Project 1 (Agler/Berrell)**

The city plans to line 50,589 linear feet of 544 sanitary sewer laterals in the north Linden Agler/Berrell area (see figures 1-6).

The city will install cured-in-place resin impregnated flexible tube pipe linear in-service laterals. The lateral liner will be installed from the sewer main and/or exterior cleanout. When installed, cured, and complete, the liner will extend from the sewer main to within four feet of the house foundation.

#### **Project 2 (Oakland Park/Medina)**

This project will line about 790 sanitary sewer service laterals (about 50,000 linear feet) in the north Linden Oakland Park/Medina area (see Figure 7).

### **Implementation**

The city passed an ordinance in October 2014, authorizing an increase in sewer rates in January 2015. Inside the city, residential rates increased approximately 2.89 percent. Outside the city, residential customer rates increased 3.0 percent. The Department of Public Utilities continues to offer the low-income discount program that reduces qualifying participant's sewer commodity portion of their sewer bill by 20 percent.

The median household income (MHI) of Columbus is \$44,774. The projected 2024 average yearly residential user rate is \$777 which is 1.7 percent of the MHI and is slightly higher than the statewide average of 1.3 percent.

The City of Columbus is requesting a \$14.6 million low-interest loan from the WPCLF for these two projects. Columbus qualifies for a standard 2.41% loan rate. This will save the city approximately \$2.2 million over a 20-year loan compared to the market rate, which is currently at 3.66%. Interest rates are set monthly and may change for the requested loan award date.

Both projects will take approximately 18 months to be completed.

## **Public Participation**

Public outreach has been completed over a period of time through multiple methods. For this project area, door hangers and letters were distributed to residents notifying them of public meetings occurring in April of 2017, February and March of 2018, June of 2019 in coordination with One Linden, February of 2020 for Linview Park, and December 2020. These public meetings provided residents with the opportunity to speak to Blueprint team members about the Blueprint process and the proposed improvements. OaklandPark/Medina basin markings and field outreach occurred January 6-7, 2021. There were homeowner meetings with the inspection team and contractor.

All residents can obtain detailed information about the lateral lining (LL) by viewing the Columbus Blueprint Four Pillars videos and downloading the Frequently Asked Questions brochure from the website ([www.columbus.gov/utilities/projects/blueprint/Four-Pillars/](http://www.columbus.gov/utilities/projects/blueprint/Four-Pillars/)). Printed copies of the brochures are also available at all Blueprint events and shared during individual site visits with residents.

The property owners will be notified by mail at least one week prior to work commencing. A door hanger will be placed 5-10 days prior to work commencing. A door hanger will also be placed with a 48-hour notice before work commences. The contractor foreman will knock on doors one hour prior to work. After work is complete, a hand-delivered notice of completion will be given to residents.

Ohio EPA will also publicize this document at the following website: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements>.

## **Conclusion**

The proposed projects meet the criteria for a Limited Environmental Review (LER); namely, they are actions within an existing public wastewater collection system, which involve improvements to existing infrastructure. Furthermore, the projects meet the other qualifying criteria for an LER; specifically, the proposed projects:

**Will have no significant environmental effect and will require no specific impact mitigation** because construction will not adversely affect any special resource type and these projects will result in reduced volumes sent to the WWTP for treatment.

**Will have no effect on high-value environmental resources** as construction will be limited to the repair of existing sewer pipes and in road rights-of-way. No significant ground disturbance will take place as part of this project, so there will be no effects to the following: floodplains, wetlands, surface water, endangered/threatened species or their habitat, state and federally designated wild and scenic rivers, recreational rivers, or wildlife areas, and archaeological, historic or cultural resources.

**Is cost effective** because the repairs of sewer laterals is more cost effective than full replacement, and as the project reduces I/I and the volume that requires treatment.

**Is not a controversial action** as there is no known opposition to the proposed project, and the cost of the project will be reduced by WPCLF financing.

**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 since the project involves the repair of existing equipment and does not affect discharges.

Will not provide capacity to serve a population substantially greater than the existing population because the project addresses the existing population.

**Contact information**

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 Ohio EPA, Division of Environmental & Financial Assistance  
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 Columbus, Ohio 43216-1049  
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Figure 1. Project 1, Location 1



Figure 2. Project 1, Location 2



Figure 3. Project 1, Location 3

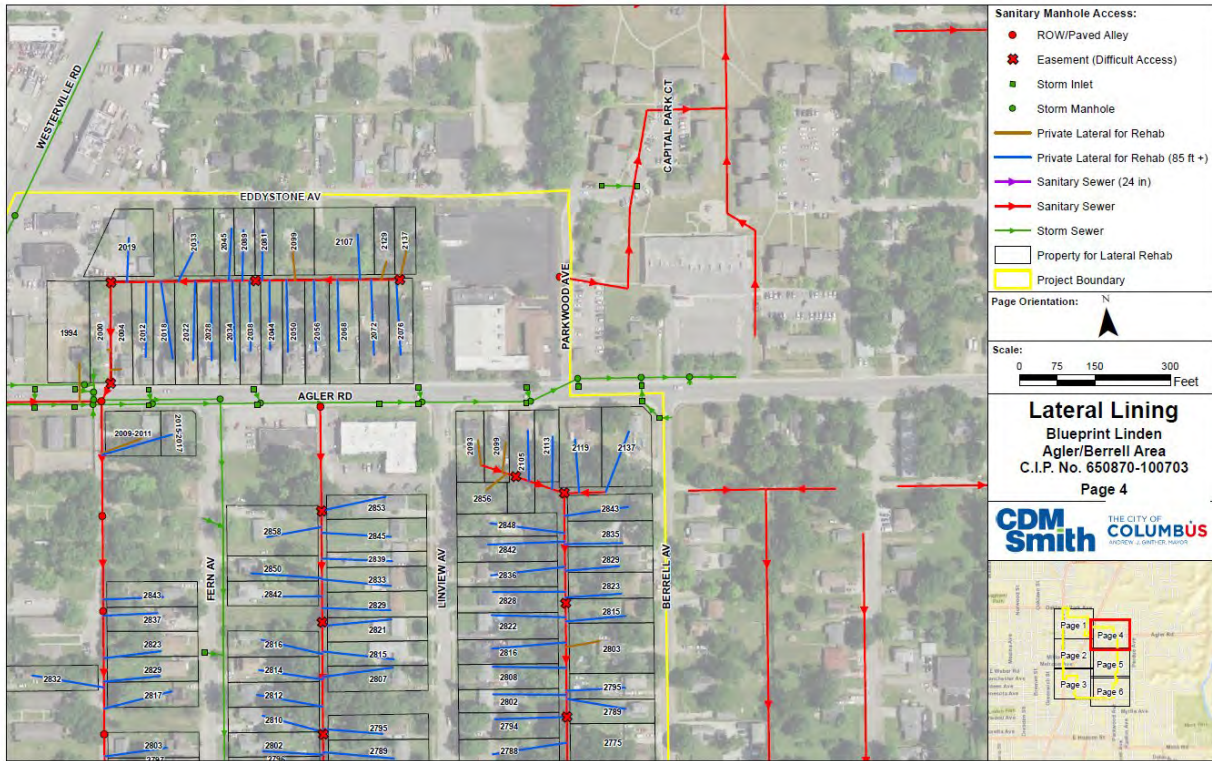


Figure 3. Project 1, Location 4

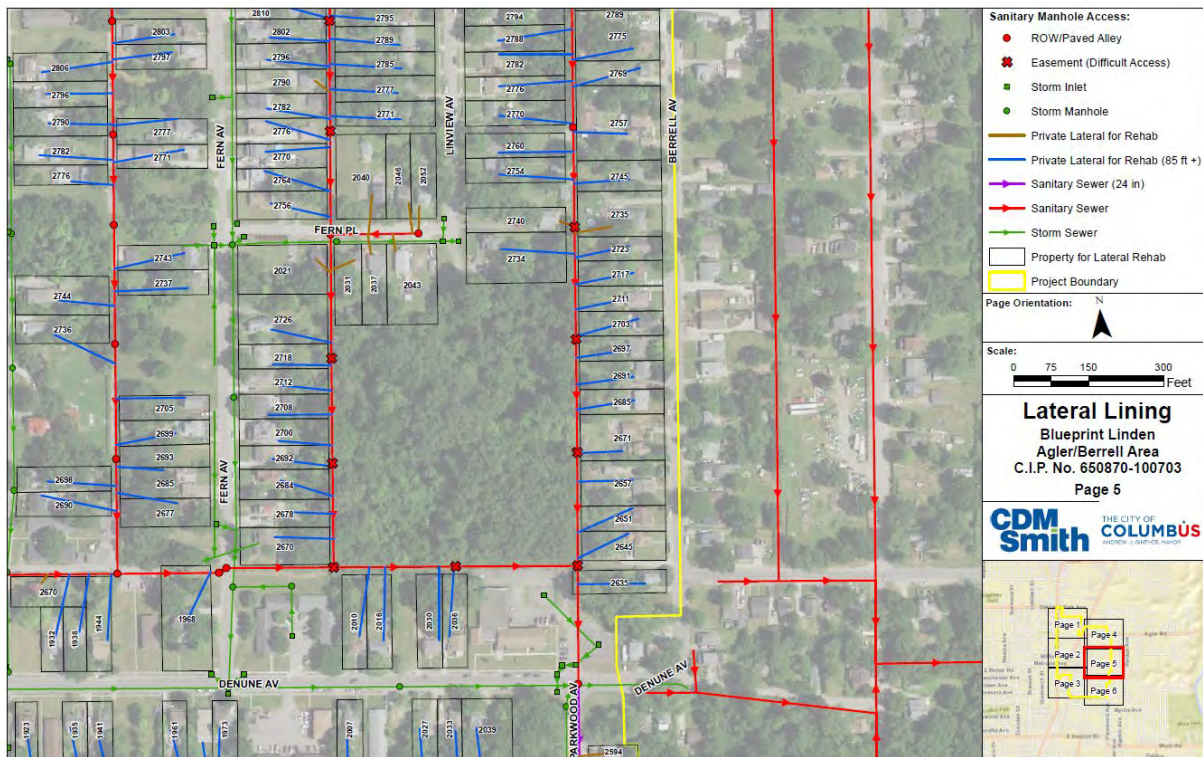


Figure 4. Project 1, Location 5

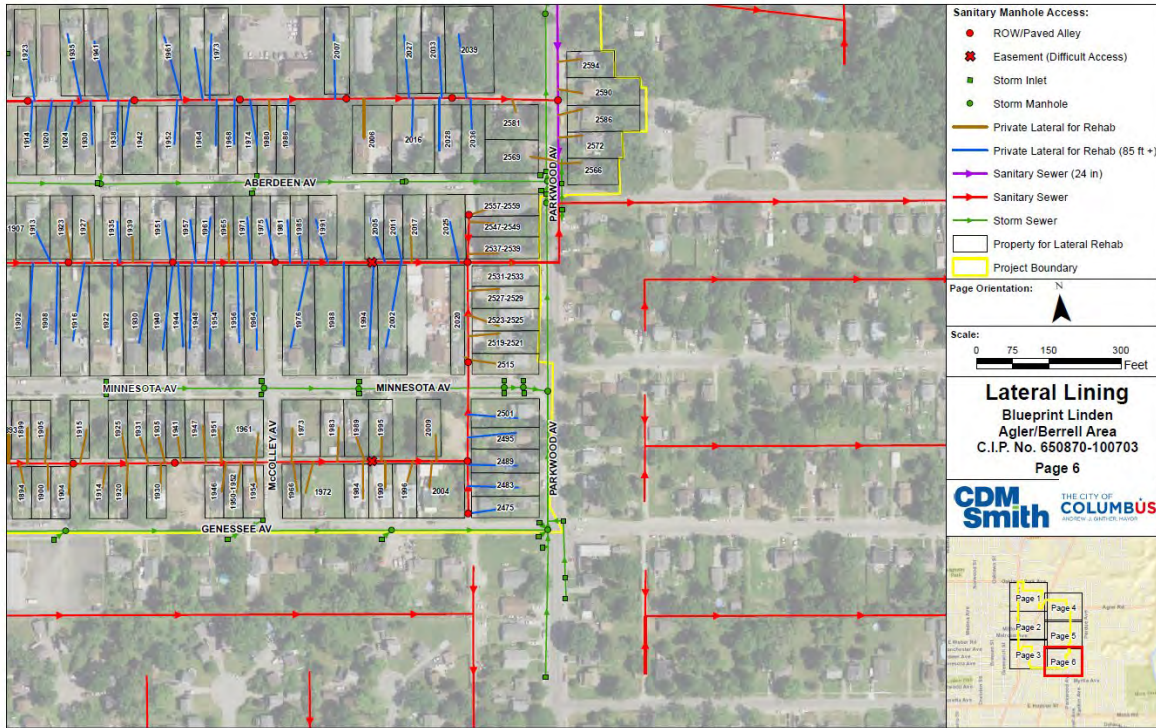


Figure 5. Project 1, Location 6



Figure 7. Project 2: Oakland Park/Medina area where lateral lining will take place