January 31, 2025

Limited Environmental Review and Finding of No Significant Impact

City of Columbus – Franklin County
BP Hilltop 1-LL-Eureka/Fremont 5
Loan number: CS390274-0506

The attached Limited Environmental Review (LER) is for a sewer repair project in Columbus which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, costs, and expected environmental benefits. Making available this LER fulfills the 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 program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. In accordance with Ohio Administrative Code 3745-150-05, this project meets the criteria for an LER rather than the more comprehensive Environmental Assessment. More information can be obtained by contacting the person named at the end of the attached LER.

Upon issuance of this Final 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,

Kathleen Courtright

Kathleen Courtright, Assistant Chief
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LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: BP Hilltop 1-LL-Eureka/Fremont 5

Applicant: City of Columbus
910 Dublin Road
Columbus, Ohio 43215

Loan Number: CS390274-0506

Project Summary

The City of Columbus is requesting $11,286,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the BP Hilltop 1-LL-Eureka/Fremont 5 sanitary lateral lining for homes in the Hilltop 1 Blueprint area (Figure 1.)

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 Ohio 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. The Hilltop neighborhood of Columbus, also known as the Eureka/Fremont area, is one such project area that has suffered from extensive stormwater flooding in recent years. City records show surface and street flooding at 80 different locations from 2003 through 2017, and sanitary sewer backups into 178 homes since 2002. The area has separated sanitary and storm sewer systems; however, both were constructed in the early 1900's and are in need of repair. To reduce the flooding, Columbus looked at green infrastructure to better handle the heavy rainfall events. The project area also has a history of water in basement (WIB) issues. The majority of WIB complaints were caused by sewer lateral backups and local flooding caused by blocked or restricted storm sewers.

Project Description

The project area (see Figure 2) is bound by Broad Street (north), Sullivant Avenue (south), Wheatland Avenue (east), and Hague Avenue (west). Overall, separate storm and sanitary sewers in the area flow from north to south and west to east. The project area consists of 297 acres, including 913 properties, one of which is a school, 1,569 are residential, and 113 are commercial, retail, and institutional. Approximately 932 laterals will be lined.

Implementation

The City of Columbus proposes to borrow approximately $11,286,000 from the Ohio WPCLF at the standard interest rate of 2.81%. 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 $1.7 million over the life of the loan compared to the current market rate of 4.06%.

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. After loan award, the project will take approximately 18 months to complete.

Public Participation

There were several public meetings during the design phase of this project. In addition, just before construction of the green infrastructure in the project area, the city conducted another public meeting where the upcoming lateral project was mentioned, and benefits explained.

Ohio EPA is unaware of any controversy about or opposition to this project. The Limited Environmental Review and Finding of No Significant Impact will be posted on City of Columbus and Ohio EPA Division of Environmental and Financial Assistance websites.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater treatment system, which involves improvements to existing service lines. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will require no specific impact mitigation and will have no effect on high-value environmental resources because none are present in the pre-disturbed areas where home sanitary laterals will be lined.

Is cost effective because repairing sewer laterals is less expensive than replacing them.

Is not a controversial action because sewer lining to prevent stormwater from entering the sewer lines is effective and a less expensive way to address basement backups and sewer overflows.

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 because the project does not require new or relocated discharges to line sewer laterals.

Will not provide capacity to serve a population substantially greater than the existing population because this project just addresses existing sewer laterals to existing homes.

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 address excess stormwater entering the city's sanitary sewer system which will minimize basement backups and sewer overflows.

Contact Information

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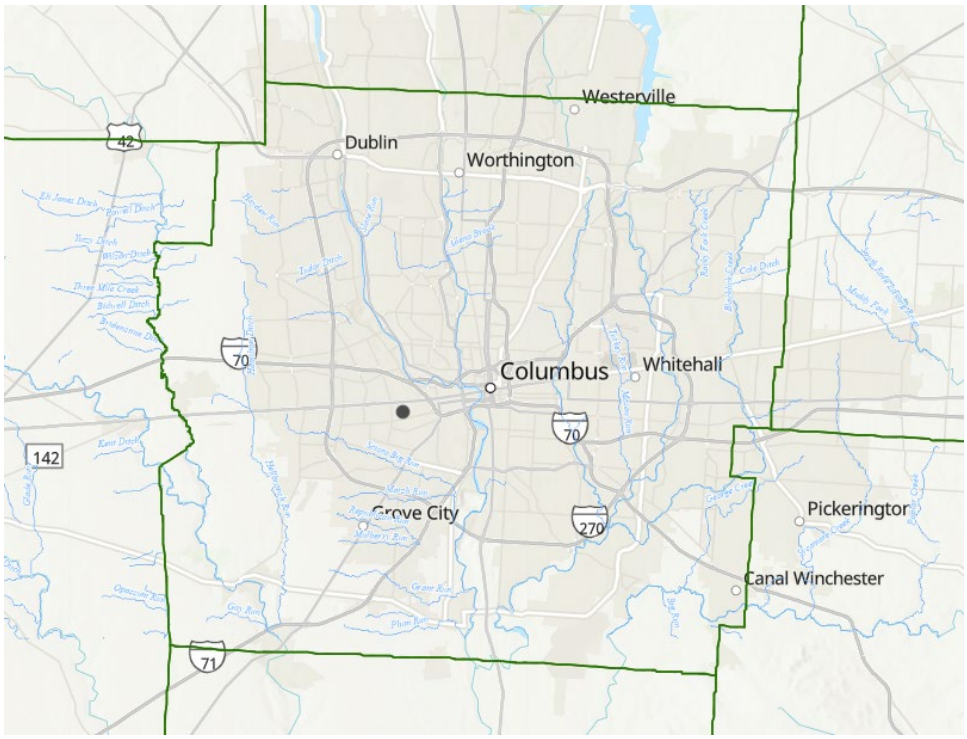

Figure 1 Location of the project area within Franklin County

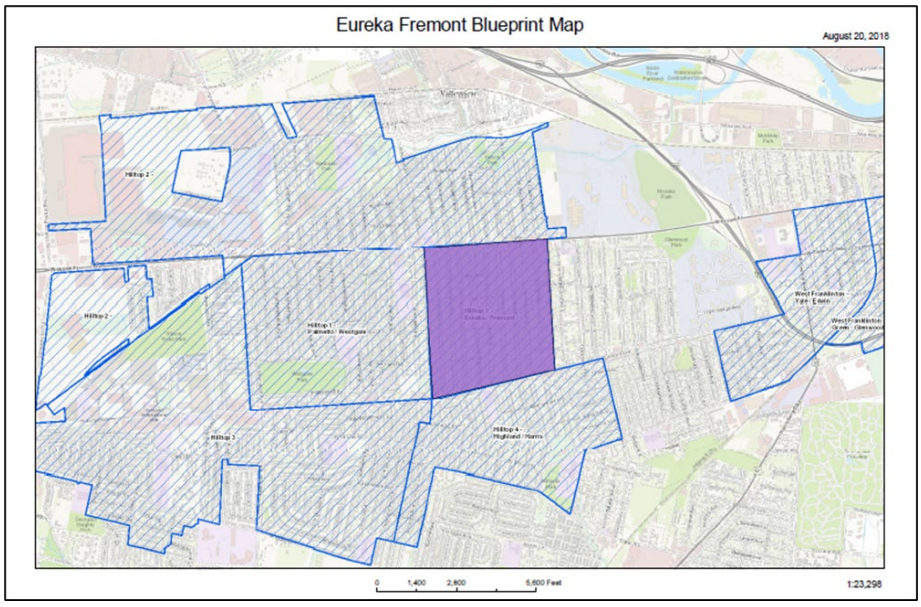

Figure 2. Location of the Eureka/Fremont area