



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

May 4, 2018

Tracie R. Davies, Utilities Director  
City of Columbus, Dept. of Public Utilities  
910 Dublin Road, Room 3020  
Columbus, OH 43215

**Re: Columbus – Woodward Avenue Sanitary Sewer Project, CIP# 650570-100000**  
**WPCLF No: CS390274-0224**  
**Finding of No Significant Impact**

Dear Director Davies:

On April 2, 2018, the Ohio EPA issued a draft Finding of No Significant Impact for the referenced project for public review and comment. The thirty-day period for comments has passed and no adverse comments were received. Therefore, the conclusions in the draft Finding of No Significant Impact become the basis for this final Finding of No Significant Impact for the referenced project.

This final Finding of No Significant Impact may be revised or rescinded at a future date based upon the presentation of information which significantly alters earlier conclusions, or failure to employ all agreed upon impact mitigation.

Sincerely,

A handwritten signature in blue ink that reads "Jerry Rouch". The signature is written in a cursive style.

Jerry Rouch, Assistant Chief  
Division of Environmental and Financial Assistance - OFA

c: OWDA  
File



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
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**April 2, 2018**  
**Preliminary Finding of No Significant Impact**  
**Columbus – Woodward Avenue Sanitary Sewer Project**  
**Franklin County**  
**WPCLF No: CS390274-0224**

The attached Environmental Assessment (EA) is for a wastewater treatment project in your area 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 EA describes the project, its costs, and expected environmental benefits. We would appreciate receiving any comments you may have on the project. Making available this EA and seeking your comments 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. More information can be obtained by contacting the person named at the end of the EA.

Any comments on our preliminary determination should be sent to me at the letterhead address. We will not act on this project for 30 calendar days from the date of this notice in order to receive and consider comments. In the absence of substantive comments during this period, our preliminary decision will become final. After that, the City of Columbus can then proceed with its application for the WPCLF loan.

Sincerely,

A handwritten signature in blue ink that reads "Jerry Rouch".

Jerry Rouch, Assistant Chief  
Division of Environmental & Financial Assistance  
Office of Financial Assistance

JR/JS

attachment

# ENVIRONMENTAL ASSESSMENT

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## A. PROJECT IDENTIFICATION

**Project Name:** City of Columbus – Woodward Avenue Sanitary Sewers, CIP No. 650570-100000

**WPCLF No.:** CS390274-0224

**Project Contact:** Tracie Davies, Director  
Columbus Department of Public Utilities  
910 Dublin Road  
Columbus, OH 43215

## B. PROPOSED PROJECT

### 1. SUMMARY

The City of Columbus in Franklin County has requested \$525,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) to construct sanitary sewers along Woodward Avenue to eliminate 14 failing home sewage treatment systems (septic tanks) that contaminate area drainage ditches and streams. (See Figures 1, 2 and 3.) The WPCLF and local funds will pay for this approximately \$549,000 project. The Central Ohio Housing Development Organization is currently implementing a multi-phase redevelopment of the American Addition, which includes the Woodward Avenue area.

Sewer construction will occur adjacent to existing roads, primarily in the public right-of-way in mown tree lawns where other utilities exist. The area of disturbance lacks significant habitat or other important environmental features. Concurrent with the proposed project, city bond funds will be used to be replace the area's 24-inch storm sewer. Prior to being filled and abandoned in place, existing storm sewers will remain in service until all the homes have connected to the new sanitary sewer.

### 2. PROJECT BACKGROUND

#### a. History and Existing Conditions

The City of Columbus Division of Sewerage and Drainage owns and operates the city's sanitary sewer system and two wastewater treatment plants, Jackson Pike (JPWWTP) and Southerly (SWWTP), which have a combined capacity of 182 million gallons per day (MGD). Wastewater from Columbus and 22 contracting suburban communities flows to one of these two plants, which together treat an average of about 180 MGD. Despite the city's expansive service, limited unsewered areas can still be found. Inspection of existing storm sewers along Woodward Avenue showed evidence of sanitary discharge (this residential area is served by private HSTS, mainly septic tanks).

A Septic Tank Elimination Program (STEP) is a partnership of the Columbus Public Health's Environmental Health Division and the Department of Public Utilities' Division of Sewers and Drains, which works to protect area water sources. The program does this by eliminating HSTS and coordinating the connection of these properties to the city's sanitary sewers. Failing HSTS are a public health threat because they can pollute groundwater, rivers and streams, potentially creating pathways for human contact with raw sewage. Because of this, the City of Columbus requires property owners using HSTS to connect to the sanitary sewer system as new service lines are constructed.

## **b. Population and Flow Projections**

The population of the City of Columbus is approximately 1,300,000, continuing to increase with significant growth expected.

The project service area includes approximately 14 single family residences. It is a developed area and little sanitary flow increase is expected. Based on average sanitary sewer flows per residence, the projected will add approximately less than 5,000 gallons per day of sewage flow, which is well within the available capacity of the SWWTP.

## **c. Water Quality**

Drainage from HSTS in the area enter the existing storm sewer which ultimately flows to Alum Creek, a tributary of the Scioto River. The Ohio EPA Scioto River Total Maximum Daily Load (TMDL) Report (2009-2010) shows full attainment of the river's Warmwater Habitat (WWH) designation both upstream and downstream of Big Walnut Creek. This project will eliminate the failing HSTS in the project area and their potential human health impact on Alum Creek.

## **3. DISCUSSION OF FEASIBLE ALTERNATIVES**

Doing nothing ("no action") would allow continued sewage leakage from failing HSTS. The no-action alternative has no direct monetary costs to residents or the city; however, leakage will increase as HSTS age, increasing health risks to the public.

Gravity sewers are most common and require no energy source to operate. Gravity sewers are set at a uniform slope between manholes, which requires deep excavations in some areas and higher construction cost than some alternatives that are less feasible as part of the Columbus sewer system. Gravity sewers are reliable with less maintenance than alternatives.

## **4. SELECTED ALTERNATIVE**

This project includes construction of a new sanitary sewer and manholes to connect to the existing sanitary sewer system.

The project is in a developed area lacking important environmental features and requires only minimal vegetation and landscape tree removal in previously landscaped areas.

Upon completion of the sewer construction, each homeowner will install a service lateral (pipe connecting the household sanitary drain to the new sanitary sewer stub) and abandon and demolish the existing HSTS.

## **5. PROJECT IMPLEMENTATION**

The City of Columbus will borrow approximately \$525,000 from the WPCLF at the Standard interest rate (now 2.14%; the interest rate is set monthly and may change for the expected August 2018 loan award). During the 20-year loan period, Columbus will save approximately \$131,000 by using WPCLF dollars at this rate, compared to the market rate of 3.39%.

Assuming the expected loan award is approved in August 2018, the City of Columbus expects construction of the proposed project to be completed in late 2019. It is expected that the initial loan repayment to the WPCLF program will be in July 2020.

The one-time cost for construction of the service lateral and septic tank abandonment is estimated at \$3,000 - \$4,000, borne by the property owner. STEP program staff will contact prospective property owners to inform them of the connection requirement and provide information to help them through the connection process. One such resource, administered by the City of Columbus, is a no-interest loan program to assist homeowners with associated expenses. Eligible homeowners are those whose homes are valued at less than \$250,000, according to the county auditor's website.

### **C. ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT**

This project, which will extend sanitary sewer service and eliminate discharge from failing HSTS, is unlikely to affect environmental features. The entire project is within an urban, developed area which lacks important environmental features, and is designed to provide sanitary sewer service to existing residents rather than provide additional capacity in the wastewater system for growth. The project is not expected to lead to new development or associated indirect or cumulative impacts that could alter or affect agriculture or land use.

Due to the nature of the proposed project and its location within previously disturbed area along street and mowed lawns, coordination with the Ohio Department of Natural Resources, Ohio's State Historic Preservation Office, and United States Fish and Wildlife Service was not required. Reviews of the respective environmental resources were completed by Ohio EPA, Division of Environmental and Financial Assistance

All sewer construction will occur in existing roads and adjacent public rights-of-way; private lawns will be disturbed for construction of the new lateral and abandonment of the HSTS. These are areas generally lacking important environmental features. Upon restoration, the presence of the sewers will be unnoticeable. The project will have no significant adverse effect on local topography. The project area is outside a floodplain and lacks wetlands.

Construction will have no effect on surface water resources or ground water resources. The nearest surface water is Alum Creek, and all structures in the project area are connected to a public water supply; no ground water wells are in the project area.

Terrestrial habitats and aquatic habitats will be insignificantly affected by this project. The January 2018 U.S. Fish and Wildlife Service species list by county indicates what threatened/endangered plant and animal species "may be present" in the project area: Indiana bat (Endangered), northern long-eared bat (Threatened), Scioto madtom (Endangered), clubshell (Endangered), northern riffleshell (Endangered), rabbitsfoot (Threatened), rayed bean (Endangered), snuffbox (Endangered), running buffalo clover (Endangered) and bald eagle (Special Concern). Vegetation in the area is limited to mowed lawns and landscaped trees within the right-of-way of an urban, developed area. Minimal landscape tree clearing is anticipated for this project. Where unavoidable, trees will be cut after September 30 and before April 1 to minimize the potential for adverse effects to the listed bat species. No trees in the project disturbance area are large enough for bald eagle nests.

Pipe alignment and manhole installation is within the public right of way along Woodward Avenue. Post-construction vegetation will be grasses on the tree lawn for ease of access and sewer maintenance. Contractors will use standard construction erosion and sediment controls

(storm inlet protection, silt fences, street sweeping) to minimize the potential for excavated soil to enter storm drains.

Franklin County currently meets standards for five of the six regulated air pollutants (carbon monoxide, sulfur dioxide, nitrogen oxide, lead and particulate matter). The area is currently in nonattainment for ozone; however, air quality will be unaffected by this project because it adds no sources of air pollution. This project to install sanitary sewers will add no permanent sources of air pollution, although short-term, insignificant increases in dust and local air pollution from construction vehicle exhaust are expected during construction and will be controlled by standard construction best management practices. For these reasons, the project should have no significant adverse short-term or long-term impacts on local air quality.

Construction noise will be audible but insignificant compared to normal vehicle traffic in the greater project area. Standard construction best management practices will minimize noise, dust and storm water runoff. Traffic will be disrupted temporarily due to street excavation and will be controlled and minimized by standard traffic controls (signs, barricades, flaggers). Public safety will be protected during construction primarily by proper traffic management in the construction area and by covering or filling trench excavations at the end of each work day. Local aesthetics will be unchanged after construction and restoration are complete; road surfaces will be repaved and tree lawns re-sodded.

This project will have little to no effect on local or regional energy supplies because gravity sewers require no energy source to operate properly.

The project is located within a previously disturbed area containing other utilities and storm sewers and will not cause a significant adverse effect to archaeological or historic resources (properties listed or eligible for listing in the National Register of Historic Places) because none are present in the project disturbance area.

In the event of archaeological finds during construction, Ohio Revised Code Section 149.53 requires contractors and subcontractors to notify the State Historic Preservation Office of any archaeological discoveries in the project area, and to cooperate with the Office in archaeological and historic surveys and salvage efforts when appropriate. Work will not resume until a survey of the find and a determination of its value and effect has been made, and Ohio EPA authorizes work to continue.

A typical Columbus household's average annual sewer bill is approximately \$530, which is 1.2% of local median household income (MHI: \$44,774). These numbers compare favorably to the Ohio average sewer bill of \$661 and 1.2% of Ohio MHI. Sewer bills below 1.8% of MHI are generally considered affordable.

In anticipation of this and many other projects, the City of Columbus issues bonds to generate the capital to proceed with construction and regularly evaluates debt service and sewer rates. As such, the sewer service charges to customers are driven by the total expected indebtedness of the City's Division of Sewerage and Drainage, and expected overall operation and maintenance costs, as opposed to the specific indebtedness of this or any other individual project. By using the WPCLF low-interest financing for this project, the City has minimized the cost to customers and the impact on the local economy.

#### **D. PUBLIC PARTICIPATION**

The City of Columbus Department of Public Utilities webpage has an information page dedicated to the Woodward Avenue Sanitary Sewers project.

The project is also included in the city's capital improvement plan (CIP No. 650570-100000), which is accessible to the public. Annual notices of sanitary and storm water rehabilitation and replacement projects are posted on the City's Department of Public Utilities webpage. It has also been discussed at City Council Meetings, which are open to the public. Based on the limited environmental and economic impacts, this is considered an appropriate level of public participation. Ohio EPA is unaware of controversy about or opposition to this project.

Ohio EPA will make a copy of this document available to the public on its webpage at <http://epa.ohio.gov/defa/ofa.aspx> ("WPCLF Documents for Review and Comment").

#### **E. REASONS FOR A PRELIMINARY FINDING OF NO SIGNIFICANT IMPACT**

Based on its review of this project's general plans, detail plans and other information, Ohio EPA concludes that no significant short-term or long-term adverse direct environmental impacts will result from the project as related to the environmental features discussed in this Environmental Assessment. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts of construction will be temporary and mitigated.

This project equally serves all affected properties along Woodward Avenue, between Brentnell Avenue and Sunbury Road, and no segment of the community will be faced with additional adverse impacts or be deprived of environmental benefits, compared to any other segment. Areas adjacent to the project have existing sanitary sewers.

For these reasons, this project, alone or in combination with other projects, is not expected to result in any significant indirect or cumulative short-term or long-term adverse environmental impacts.

The project is expected to eliminate the potential human and environmental health threats due to leakage from home sewage treatment systems in the area.

For more information, please contact:

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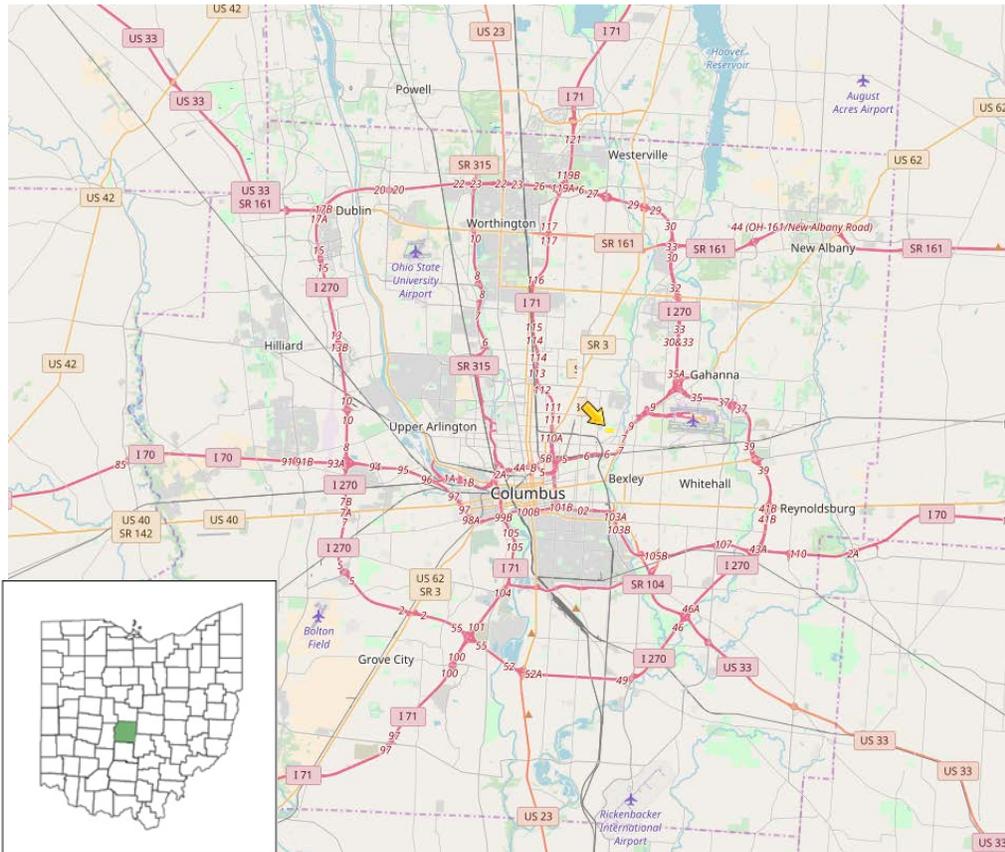


Figure 1. Project location – arrow indicates location of the proposed project

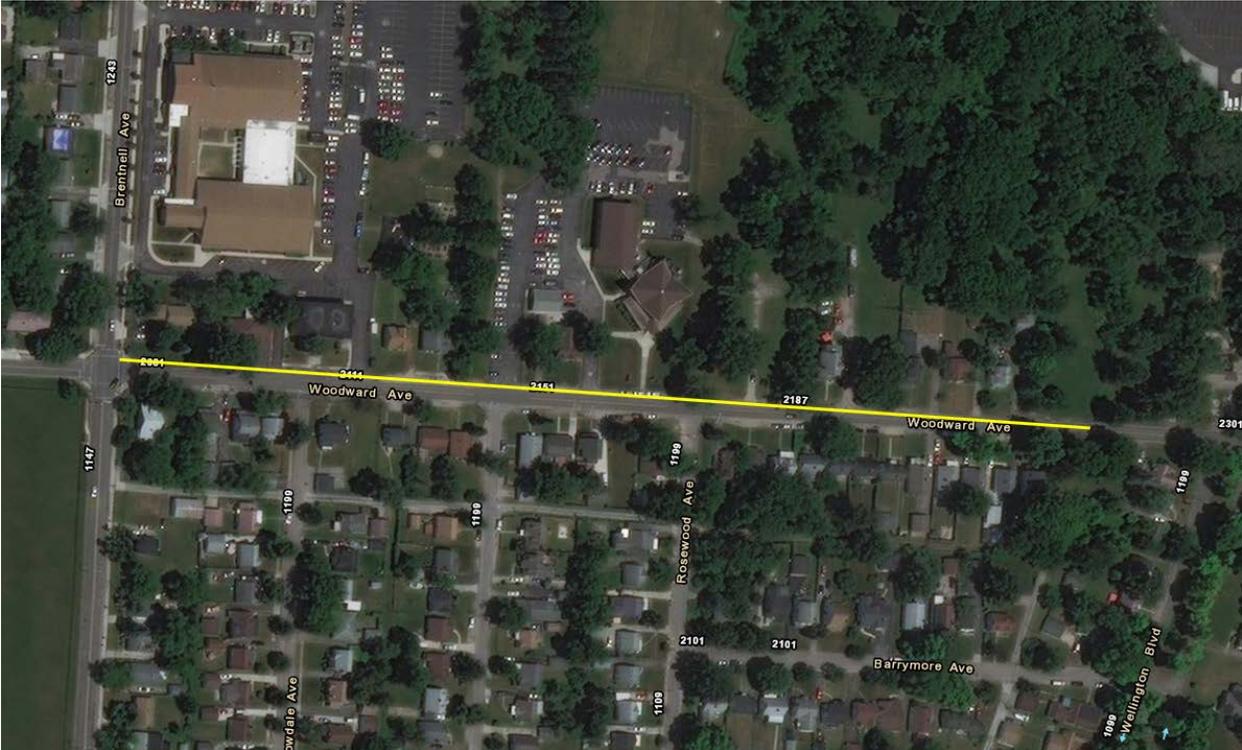


Figure 2. Site location and map.

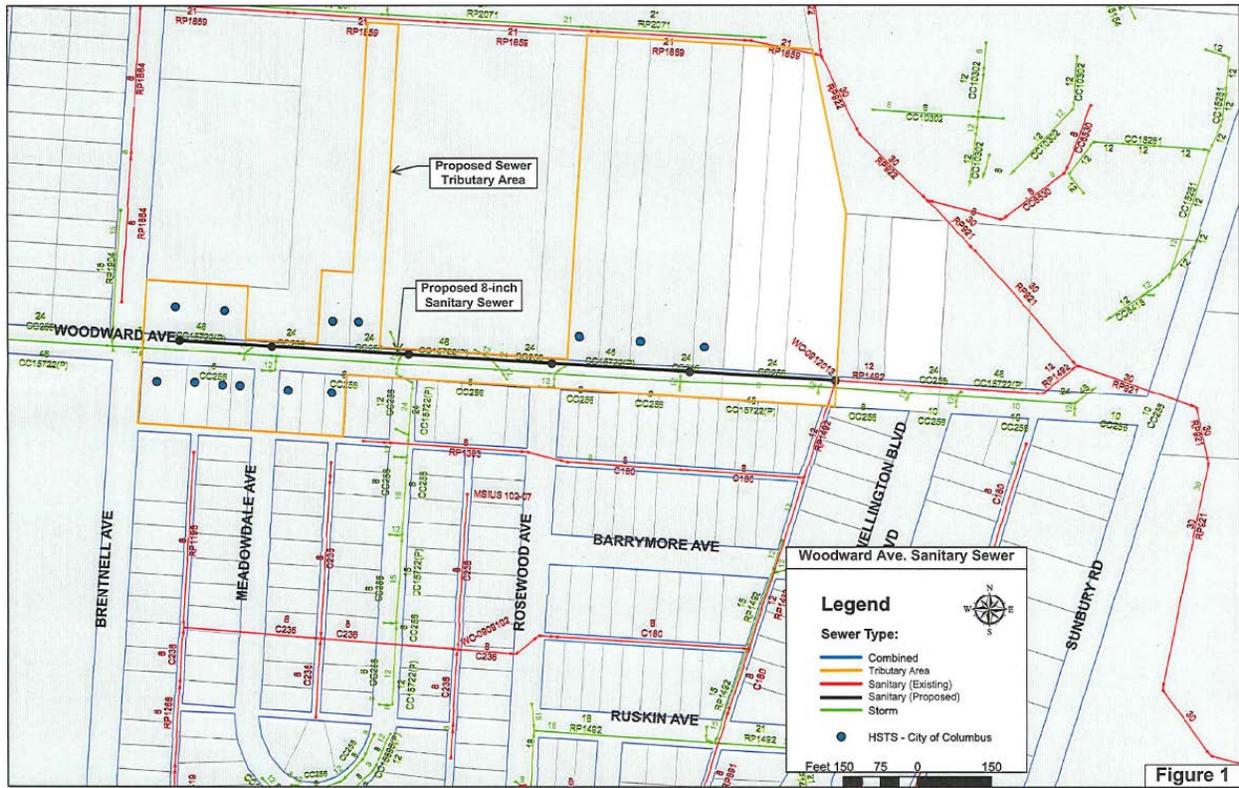


Figure 3. Site plan