



March 7, 2024

Limited Environmental Review and Finding of No Significant Impact

**City of Columbus – Franklin County
BP Linden Lateral Lining Hudson/McGuffey
Loan number: CS390274-0430**

The attached Limited Environmental Review (LER) is for a wastewater management 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 Linden Lateral Lining Hudson/McGuffey

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

Loan Number: CS390274-0430

Project Summary

The City of Columbus is requesting a \$11.5 million low-interest loan from the Ohio Water Pollution Control Loan fund (WPCLF) to line sanitary service laterals of homes within the North Linden Hudson/McGuffey project 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 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. The North Linden Hudson/McGuffey area is a traditional urban neighborhood with a typical grid layout of north/south and east/west streets. The utility layout in the area typically has sanitary sewer in the alleys and storm sewer, water, and other utilities along the primary north/south streets.

The northern part of the Hudson/McGuffey area has critical leaking problems from cracked old, vitrified clay pipe sanitary laterals and brick manholes. Stormwater is entering these laterals and causing excessive flows. Private residential laterals are thought to contribute more stormwater inflow than the main sewer line.

Project Description

The City of Columbus will line approximately 68,840 linear feet of 1,245 property laterals in the North Linden Hudson/McGuffey area. Laterals will be lined with cured-in-place resin, impregnated flexible tube pipe liner. The lateral will be lined from the sewer main and/or exterior cleanout. The liner will be installed no closer than four feet from any house foundation (figures 1 and 2).

Implementation

The City of Columbus is requesting \$11.5 million from the WPCLF. Columbus qualifies for a standard 2.47% interest rate for a 20-year loan. This will save the city approximately \$1.76 million for the life of the loan compared to the market rate of 3.72%. Interest rates are set monthly and may change for the requested loan award date.

The median household income (MHI) of Columbus is \$44,774. The projected 2024 average Columbus residential sewer bill is approximately \$777 per year, which is 1.7 % of the MHI and is higher than the annual statewide average of \$490.

By using WSRLA financing for this project, Columbus has minimized the economic impact on customers.

Once construction begins, it will take approximately two years to complete.

Public Participation

The city conducted two public meetings to discuss the Blueprint program in the North Linden project area, including lateral lining. The city will provide a 48-hour notice via door hanger to let residents know when work will be done on their laterals.

Information about this project will be posted at the following Ohio EPA website:
<https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements>.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing 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 project includes lining of existing sewer lateral lines within the previously disturbed residential areas; therefore, areas lacking important environmental features. No stream crossings or in-wetland work is scheduled to occur, and there will be no construction within prime farmland or within the floodplain. Trees will be protected, and none will be removed. The lateral lining contractor will

be responsible to ensure all private work conforms to best management practices for erosion and dust control, traffic control, noise control.

Is cost effective as addressing I/I instead of constructing expensive tunnels to handle excessive flows is a less expensive solution.

Is not a controversial action because the project will not specifically raise sewer rates. DEFA is unaware of any specific opposition to or controversy about this project that will address I/I problems.

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 sanitary service laterals of homes and does not otherwise alter discharges.

Based upon the available planning information for this project and the materials presented within this LER, Ohio EPA concludes that the proposed project will not result in any significant adverse impacts to any environmental features. The project is expected to have no significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources such as surface waters, coastal zones, riparian areas, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species.

Contact information

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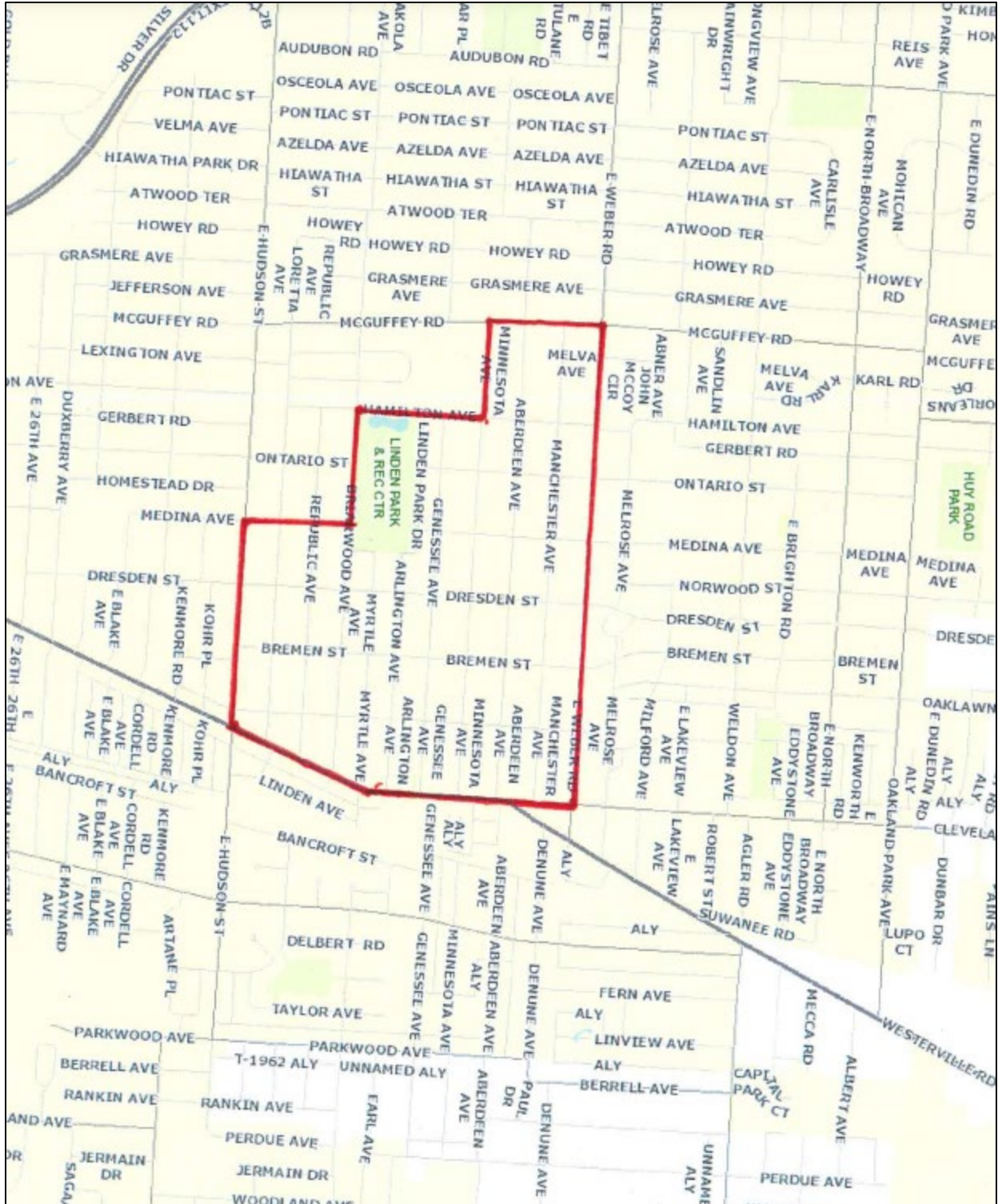


Figure 1. Location of sanitary service lateral lining of homes within the North Linden Hudson/McGuffey project area.



Figure 2. Detail of lateral lining locations.