



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

February 8, 2021

City of Columbus
Attn: Tracie Davies, Utilities Director
910 Dublin Road
Columbus, OH 43215

**Re: City of Columbus
Williams-Behm HSTS Elimination
WPCLF Loan No.: CS390274-0364
Finding of No Significant Impact**

Dear Ms. Davies:

On January 5, 2021, Ohio EPA issued a draft Finding of No Significant Impact (FNSI) for the City of Columbus – Williams-Behm HSTS Elimination project for public review and comment. The thirty-day period for comments has passed and no comments have been received. Therefore, the conclusions contained in that draft FNSI become the basis for this final Finding of No Significant Impact for the above referenced project.

This final Finding of No Significant Impact may be revised or rescinded at a future date based upon either changes to the proposed project, the presentation of information which significantly alters earlier conclusions, or failure of the applicant to perform the environmental mitigation prescribed in the draft Environmental Assessment.

Sincerely,

Jonathan Bernstein

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance



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

January 5, 2021

**Preliminary Finding of No Significant Impact
To All Interested Citizens, Organizations, and Government Agencies**

**City of Columbus – Franklin County
Williams-Behm HSTS Elimination
Loan Number: CS390274-0364**

The attached Environmental Assessment (EA) is for a sewer installation 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 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 attached EA.

Any comments on our preliminary determination should be sent to me at the email address of the contact named at the end of the EA. We will not act on this project for 30 calendar days from the date of this notice. 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,

Jonathan Bernstein

Jonathan Bernstein, Assistant Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

Project Identification

Project Name: Columbus – Williams-Behm HSTS Elimination

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

Loan Number: CS390274-0364

Project Summary

The City of Columbus in Franklin County has requested \$4,800,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) to provide new sanitary service to the Williams Road/Behm Road area and eliminate the use of household sewage treatment systems (HSTS).

Extending sanitary sewer service to this currently unsewered area will eliminate environmental hazards associated with HSTS such as potential groundwater pollution and bacteria growth in surface water. Construction for this project will occur alongside roadways in existing public rights-of-way.

History and Existing Conditions

The Williams/Behm project area is comprised of Williams Road to the south, Alum Creek Drive to the east, Behm Road to the north, and a CSX railroad to the west. Residents and industries within this area are currently serviced by 46 HSTS, of which six are considered failing. This area is considered high priority to be addressed due to the potential effects on both water quality and human health from failing HSTS systems. Additional waterlines and private utilities are also located within the project area.

Maps of the project area are provided in the exhibits below.

Population and Flow Projections

Installation of a new sanitary sewer in the Williams/Behm area will eliminate 46 existing HSTS. Prior analysis determined there will be nominal impact to the existing downstream sewers; therefore, there is capacity for the proposed sanitary sewer flows. The downstream tie-in for this project will be an 18-inch sewer located in an existing easement east of Alum Creek Drive, southwest of the Willowing Court cul-de-sac. Design criteria and capacity were taken into consideration for possible further expansion within or adjacent to this area.

Alternatives

- *No action*: Doing nothing, the “no-action” alternative, would continue to allow for the area’s wastewater to be treated by HSTS. As some of these systems are currently failing and others experience deterioration over time, the continued use of these systems can lead to environmental and human health hazards. Due to this public health and water quality concern, this is not a feasible alternative.
- *Installation of new sewer system*: The residents and industries located within the Williams-Behm area can connect into the city’s existing wastewater system through installation of a new sanitary sewer. Various alternatives were considered based on pipe design criteria, capacity, and installation methods. All proposed sanitary sewer alternatives tie into the existing sewer main east of Alum Creek Drive.
 - a. *Alternative 1* uses gravity sewers ranging from 8- to 18-inch diameters to convey flows into the downstream tie-in sewer. To avoid the existing utilities throughout the project corridor, Alternative 1 traverses within the roadways of Williams Road, Alum Creek Drive, Behm Road, and Strack Road.
 - b. *Alternative 2* uses the same alignment as the Alternative 1 proposed sewer; however, utilizing a 10-foot deep gravity sewer service. This option would be less economical than Alternative 1 because the sewer is deeper and would require more excavation and backfill during construction. Additionally, Alternative 2 requires larger diameter sewers to accommodate the increase in upstream depth, which further increases costs.
 - c. *Alternative 3* proposes an alignment with the sewer network outside the traveled way as much as possible. This alternative could reduce construction costs by minimizing the amount of pavement repair; however, would require approximately 23 easements, and would disrupt residents more than Alternatives 1 and 2. The easements would delay the project substantially, increase the cost for the project, and could be controversial among commercial and residential property owners. Though the alignment reduces construction costs by staying out of the road, the value added would be unrealized with the added costs of easement acquisition.

Selected Alternative

In considering the social, economic, and constructability of each design, Columbus elected to move forward with the alignment detailed in Alternative 1. This alternative will meet the project goal to remedy home sewage treatment systems in the area, while minimizing disruption to residents at an optimized cost.

This alignment, shown in the exhibits below, will install new sanitary sewer service to residents and commercial properties in the previously developed area near Williams and Behm roads. Once constructed, this new sewer line will tie into the existing 25-foot deep, 18-inch sewer, located within a 40-foot easement perpendicular to and running east of Alum Creek Drive.

The alignment selected best avoids conflicts with utilities by remaining within the south lane of Williams Road. The south lane of Williams Road is absent of utilities, which enables the proposed sewer to traverse in the same lane without impacting existing utilities. It also will avoid other utilities on Behm Road, Strack Road, and Alum Creek Drive. Confining construction to one lane wherever possible also minimizes impacts to traffic and driver safety. Disruption to residents will be minimized, and easements are not needed as construction will take place within existing roads and rights-of-way. The proposed alignment will also avoid impacts to existing storm sewers as well as storm water retention ponds located within the area.

Alternative 1 is the most economical design because it optimizes design criteria for design capacity and sewer depth while enabling the city to maintain options for future development.

Implementation

Project Costs

Columbus plans to borrow \$4,800,000 from the WPCLF to finance the project. During the 20-year loan period Columbus will save approximately \$660,848 by using WPCLF dollars at the Standard Rate of 0.53%, compared to the market rate of 1.78%.

Project Schedule

The anticipated loan award will occur in February 2021. Construction is expected to begin following in the second quarter of 2021 and is expected to be completed by the second quarter of 2022.

Public Participation

A public notice was posted on the City of Columbus' Public Utilities webpage detailing the proposed construction project. Contact information was provided for any public questions or concerns. Each impacted resident will receive written notifications from the contractor prior to the construction work. The notifications will give information on the timing of the work and contact information.

Reviews of the respective environmental resources were completed by Ohio EPA, Division of Environmental and Financial Assistance.

Ohio EPA will make a copy of this document available to the public on its web page: <http://epa.ohio.gov/defa/ofa.aspx> (Under the "What's New" tab, scroll to "Documents Available for Review and Comment - WPCLF Documents for Review and Comment") and will provide it upon request to interested parties. Information supporting this Environmental Assessment (EA) is available from the project contact named below.

Environmental Impacts

Construction of this project could affect environmental features. Because the project is designed to eliminate environmental hazards through the elimination of failing HSTS, the project is not expected to lead to new development or associated indirect or cumulative environmental impacts.

Construction will occur in previously disturbed areas, within roads and public rights-of-way. No change to land use or topography will occur.

Air Quality

Franklin County is in attainment for all regulated criteria air pollutants applicable to this project. The contractor will prevent unnecessary dust from construction activities from entering the atmosphere. Dust on unsurfaced streets or parking areas and any remaining dust on surfaced streets shall be controlled with water as needed. Because of this approach, there will be no significant adverse short-term or long-term impacts on local air quality.

Archaeological and Historical Resources

The planned area of construction has been previously developed and all excavation work will take place within previously disturbed roads and rights-of-way alongside other installed utilities. As no new excavations will occur, no impacts are expected to archaeological or historical resources.

However, in the event of archaeological finds during construction, Ohio Revised Code Section 149.53 requires contractors and subcontractors to notify SHPO 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.

Terrestrial Habitat and Endangered Species

Nine federally listed species occur in Franklin County: the endangered Indiana bat, the endangered running buffalo clover, the endangered Scioto madtom, the endangered clubshell mussel, the endangered northern riffleshell, the endangered rayed bean, the endangered snuffbox mussel, the threatened northern long-eared bat, and the threatened rabbitsfoot mussel.

The area of disturbance during construction is limited to existing roads and previously disturbed rights-of-way. No habitat suited to the species listed above is in the project area. Based on this information, the project will have no significant adverse short-term or long-term effect on terrestrial habitat or endangered species.

Farmland Protection

Based on the review of the project planning and design, the project will not remove or change the use of prime farmland, so no farmland losses are expected as a result of this project.

Floodplains

According to project planning and design, no construction is scheduled to occur within designated flood hazard zones. Therefore, local floodplain development regulations were met.

Ground Water Resources

To avoid adverse impacts to ground water resources, the construction contract includes specifications for appropriate and safe dewatering of deep excavations and management of ground water.

Safety, Noise, Traffic, and Aesthetics

A traffic plan has been developed by the contractor prior to commencing construction which includes all proper warning signs and lane closures. The contractor commits to minimize both the extent and duration of the disruption of traffic and disturbance to the neighborhood during construction. Local aesthetics will be unchanged after construction is complete. For these reasons, the project will not adversely affect noise, traffic, public safety, or aesthetics.

Surface Water Resources

An Ohio EPA General Storm Water NPDES Permit for Construction Activities will be obtained and the contractor will minimize soil from eroding or otherwise entering onto all paved areas and into natural watercourses, ditches, and public sewer systems. Designated Wild and Scenic Rivers will be unaffected by this project as there are none located within the project's vicinity.

Wetlands

According to a review of project planning and design and the Ohio Wetlands Inventory, this project

will contain no in-wetland work and therefore will have no impacts on wetland areas.

Energy Use

This project will have little effect on local or regional energy supplies. Through utilizing the already existing Columbus wastewater treatment system in place, no additional energy from the county is required.

Local Economy

Columbus has minimized project costs by obtaining a low-interest loan through the WPCLF. This allows a lower annual sewer bill for the new customers than otherwise would be possible. The projected residential sewer bills with the implementation of this project and other associated projects will be approximately \$737/year. This is approximately 1.5% of the median household income (MHI) of Columbus, which is \$49,478.

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

Conclusion

Based upon the available facilities plans, detail plans, and other information for this project, 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 the entire affected community and no segment of the community will be faced with additional adverse impacts or be deprived of environmental benefits, compared to any other segment.

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 on the quality of the human environment or on sensitive resources.

The project will provide sanitary sewer service to the residents and commercial properties of the Williams-Behm area and will eliminate the potential for environmental and public health hazards as a result of faulty HSTS.

Contact

For further information, please contact:

Kristin Parrish
Ohio EPA-DEFA
P.O. Box 1049
Columbus, OH 43216-1049
(614) 644-3662
kristin.parrish@epa.ohio.gov

Exhibit 1: Project Location Map



Exhibit 2: Project Location Map



Exhibit 3: Project Location Map

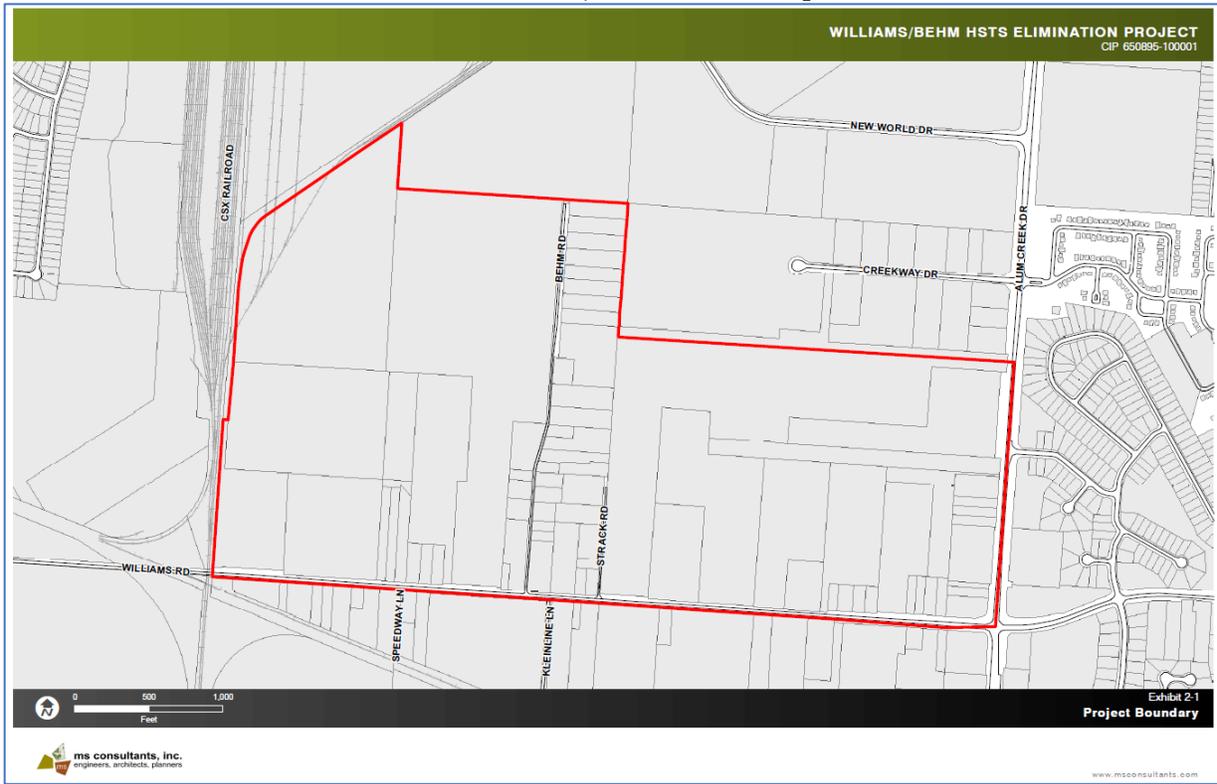


Exhibit 4: Selected Sewer Alignment

