



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

March 1, 2011

FINDING OF NO SIGNIFICANT IMPACT
TO ALL INTERESTED CITIZENS, ORGANIZATIONS,
AND GOVERNMENT AGENCIES

Columbus Berliner Park Sewer Improvements, CIP 650742
WPCLF #: CS390274-0115

The purpose of this notice is to seek public input and comments on Ohio EPA's preliminary decision that a Supplemental Environmental Study is not required to implement the recommendations discussed in the attached Environmental Assessment of a wastewater facilities plan submitted by the City of Columbus.

How were environmental issues considered?

The Water Pollution Control Loan Fund program requires the inclusion of environmental factors in the decision-making process. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed alternatives in its review and approval process. Environmental information was developed as part of the facilities plan, as well as through the facilities plan review process and during site inspections. The Agency's preliminary Environmental Assessment found that the project does not require the preparation of a Supplemental Environmental Study.

Why is a Supplemental Environmental Study not required?

Our environmental review concluded that significant environmental impacts will not result from the action. Any adverse impacts have either been eliminated by changes in the facilities plan or will be reduced by the implementation of the mitigative measures discussed in the attached Assessment.

How do I get more information?

A map depicting the location of the project is included as part of the Environmental Assessment. The Environmental Assessment presents additional information on the project, alternatives that were considered, impacts of the action, and the basis for our decision. Further information can be obtained by calling or writing the contact person listed in the back of the Environmental Assessment.

How do I submit comments?

Any comments supporting or disagreeing with this preliminary decision should be submitted to me at the letterhead address. We will not take any action on this facilities plan for 30 calendar days from the date of this notice in order to receive and consider any comments.

What happens next?

In the absence of substantive comments during this period, our preliminary decision will become final. Columbus will then be eligible to receive loan assistance from this agency.

Please bring any information that you feel should be considered to our attention. We appreciate your interest in the environmental review process.

Sincerely,



Gregory H. Smith, Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

A. Project Identification

Name: Columbus Berliner Park Sewer Improvements, CIP 650742

Address: Tanya Arsh, P.E., Director
Columbus Department of Public Utilities
910 Dublin Road
Columbus, OH 43213

WPCLF #: CS390274-0115

B. Proposed Project

1. Summary

The City of Columbus in Franklin County has requested \$3,310,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) to improve sanitary and storm sewers in Berliner Park. The popular recreation area is served by gravity sewers and storm sewers that drain to an aged and deteriorated combined sewer that routinely back up and cause overflows from manholes and into basements.

As part of comprehensive improvements to the regional sanitary sewer system, Columbus proposes rehabilitating sanitary sewers, replacing some sanitary sewers with grinder pumps and small diameter force mains, disconnection of storm sewers from a combined sewer and construction of storm drain wells and infiltration trenches, and construction of a storm water pump station to alleviate flooding in the park and adjacent areas. Construction will affect primarily developed areas of the park and require little disturbance to vegetated areas.

2. Project Background

a. History and Existing Conditions

The sanitary and storm sewer systems in Berliner Park are compromised due to age and to conditions in the downstream sewers.

The area was originally served by the Old Dry Flow Sewer, built in 1895. It was in poor condition by the early 1900s and was soon abandoned upstream of the Berliner Park area. Recent construction of new storm and sanitary sewers along Greenlawn Avenue allowed abandonment of another span of the Old Dry Flow Sewer. Only a sanitary sewer and a storm sewer along Deckebach Road in Berliner Park drain to the Old Dry Flow Sewer, then to the Olentangy-Scioto Interceptor Sewer (OSIS). The OSIS surcharges during wet-weather events, which in turn surcharges the Old Dry Flow Sewer and floods Berliner Park with combined sewage, a human health threat.

The sanitary sewers in Berliner Park were constructed as part of several different projects since the construction of the Old Dry Flow Sewer. Only a shelter house, a maintenance building, and the Berliner Athletic Complex building are served by 8-inch sewers that flow into the Old Dry Flow Sewer. Other park buildings are connected to a dedicated sanitary sewer.

A 15-inch diameter storm sewer serves the parking lot in the northwest corner of the park and drains into the Old Dry Flow Sewer. The remaining storm drainage system in the park consists of three storm drainage wells and a 12-inch diameter storm pipe with three catch basins that drains to a wooded area along the Scioto River. Inadequate storm drainage also leads to flooding that presumably also affects the aged sanitary sewers in the park.

b. Population and Flow Projections

Berliner Park is heavily used in warm weather, especially the softball fields on evenings and weekends. The existing maintenance building, shelter house, and Berliner Athletic Complex, served by sanitary sewers that drain to the Old Dry Flow Sewer, have minimal sanitary flows. All other park buildings are connected to a dedicated sanitary sewer and are not part of the proposed sanitary sewer improvements.

c. Water Quality

The Scioto River downstream of the Greenlawn Dam south of downtown Columbus is designated Warmwater Habitat (WWH) in the Ohio Water Quality Standards. WWH defines the "typical" range of warmwater aquatic organisms for Ohio rivers and streams, and represents the principal restoration target for the majority of water resource management efforts in Ohio. The Scioto River in the project area and immediately downstream is in partial attainment of the WWH criteria.

3. Discussion of Feasible Alternatives

This project is part of comprehensive improvements to the OSIS system, most notably the construction of the Olentangy Augmentation Relief Sewer (OARS). Identified problems of the regional sanitary sewer system (sewer backups to the land surface and into homes, which is a human health threat) require correction. Therefore, Columbus has rejected the "no-action" alternative (allowing the status quo to continue) in favor of constructing improvements, including the OARS and the proposed Berliner Park sanitary and storm sewer improvements. The Berliner Park improvements are based on the comprehensive planning and design for the OARS, which includes abandonment of the Old Dry Flow Sewer.

To maintain full sanitary service in Berliner Park as part of the OARS plan, Columbus evaluated gravity sanitary sewers and grinder pumps with force mains to route flows directly to the OSIS. To improve storm water management in the park as part of the

OARS plan, Columbus evaluated storm sewers, storm sewers and a pump station, and a combination of storm sewers and pump station with “green infrastructure” (infiltration trenches and drainage wells) to eliminate ponding.

The existing sanitary services to the Berliner Athletic Complex, shelter house, and maintenance garage need to be rerouted to the OSIS for the Old Dry Flow Sewer to be abandoned. Hydraulic studies suggested gravity sewers could convey park flows to the OSIS, but without adequate assurance to Columbus that surcharging would not occur. Grinder pumps with small diameter force mains not dependent on gravity provide greater flexibility for the connection to the OSIS, which could provide decreased likelihood of surcharging and overflowing.

Columbus studied options for an effective outfall for the existing storm sewer in the park, and for green infrastructure alternatives to reduce ponding and correct ongoing drainage problems in the park.

4. Selected Alternative

The recommended sanitary sewer alternative is the installation of a grinder pump at the Berliner Athletic Complex, the shelter house, and at the maintenance garage, and a small diameter force main to a central collection manhole near an existing OSIS manhole. The grinder pump package includes a check valve on the discharge line to prevent backup from the receiving sewer. As a further safeguard, a sluice gate will be provided on the gravity sewer line from the collection manhole to the main OSIS sewer which could be closed during severe rain events to prevent backups and overflows in the park. Several hundred feet of existing small diameter sanitary sewers that are no longer required will be abandoned in place.

The recommended storm water alternative is to improve storm drainage within the park with green infrastructure that infiltrates runoff near its source and captures pollutants before they are transported to nearby surface waters.

The storm sewers in Berliner Park that are connected to the Old Dry Flow Sewer will be disconnected and replaced with new bioretention cells, several dry wells, and several infiltration trenches (collectively “green infrastructure”). To prevent river water from backing up in storm sewers and flooding parking lots during flood conditions, this project includes installation of a new storm water pump station on the storm sewer outlet into the river to move water into the river when the storm gate closes due to high flows in the river.

This project includes the filling and abandonment of the Old Dry Flow Sewer upon completion of the new sanitary and storm drainage improvements.

Work in Berliner Park will occur from October to April of 2011-2012 and 2012-2013 to avoid disrupting major uses of the park.

5. Project Implementation

Columbus will borrow approximately \$3,310,000 from the WPCLF at the standard interest rate (3.95% for a March 2011 loan). During the 20-year loan period, Columbus will save approximately \$841,000 by using WPCLF dollars at this rate, compared to the market rate of 5.22%.

Assuming loan award in March 2011, and considering the high-use period of the park begins in April, construction will begin in October 2011 and run through March 2012, with additional work, if needed, commencing again in October 2012 until March 2013.

This loan will be repaid from the sewer rate revenues in effect and requires no rate increase.

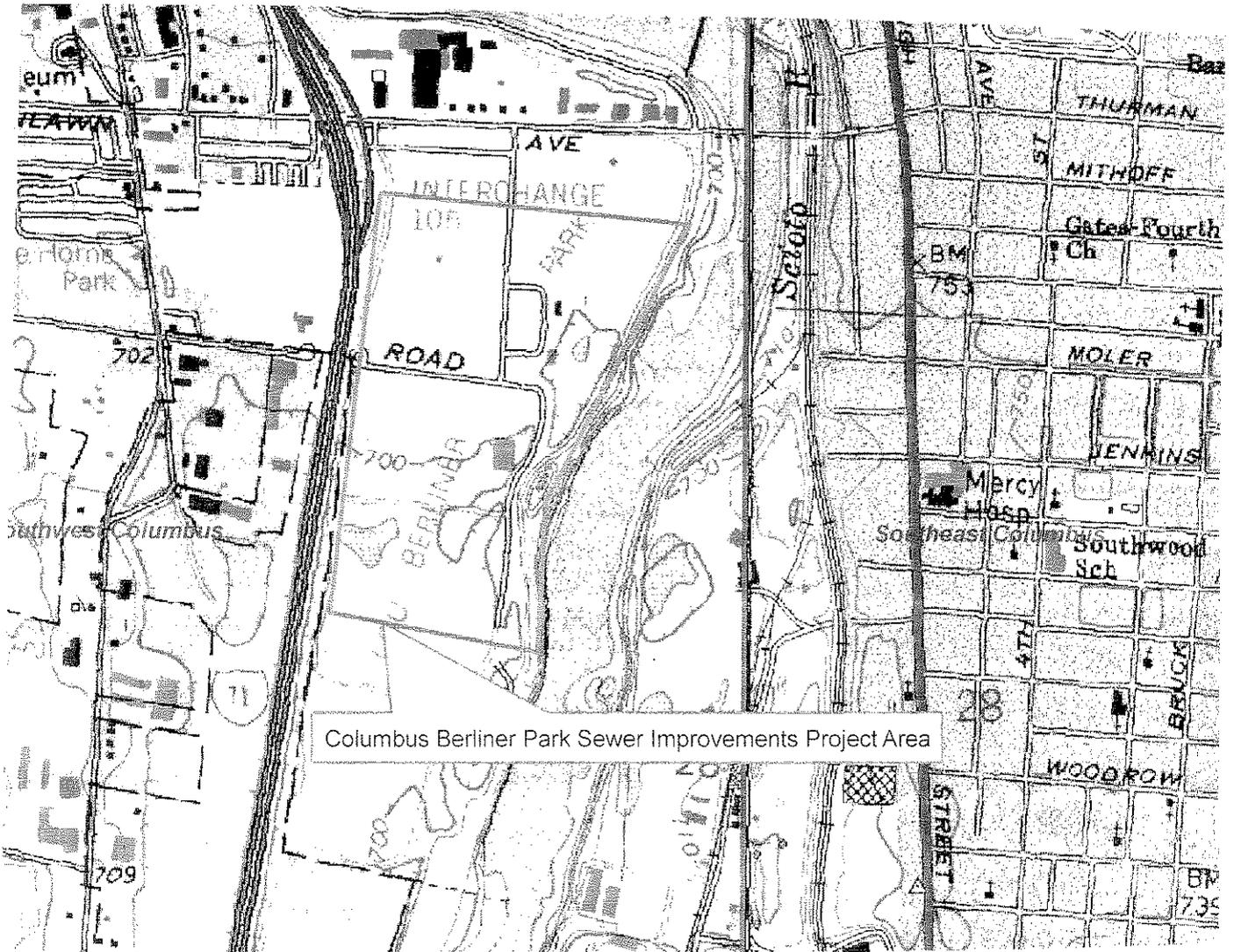


Figure 1 – Project Location

C. Environmental Impacts of the Proposed Project

This project could directly affect environmental features. Because the project is designed to correct identified deficiencies in existing sanitary sewer infrastructure, 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.

Major land forms will be unaffected by this project that replaces existing sanitary and storm water pipes and associated infrastructure with new pipes and infrastructure.

Construction will occur in the Scioto River regulatory floodplain (much of Berliner Park is in the regulatory floodplain). However, the Columbus Floodplain Administrator determined that the improvements will not alter downstream or upstream flood elevations.

No regulatory wetlands are in the immediate project area; no wetlands will be affected by this project.

The Scioto River in the project area is not a water supply, and this project will have no effect on river flows. No water supply wells are in or near the project area. The proposed dry wells are classified as "Class V" (injection) wells that are regulated by the Ohio EPA. Storm drainage into Class V wells is allowed by state law and is not expected to impact ground water quality or quantity. Columbus will submit the required inventory form to Ohio EPA upon completion of the wells. For these reasons, this project will have no effect on surface water resources or ground water resources.

Terrestrial habitats will be minimally affected by this project that will disturb primarily open recreation areas and parking lots and drives in Berliner Park; minimal vegetation removal will occur during cold weather, which will avoid potential impacts to the endangered Indiana bat (although no suitable habitat is present in the construction area). Aquatic habitats will be unaffected by this project that involves no disturbance to streams or wetlands.

Agriculture and land use will be unaffected by this project that will maintain Berliner Park's recreation areas and that occurs entirely on land that is not in agricultural production.

This project adds no sources of air pollution and will have no impact on local or regional air quality beyond insignificant increases in dust and local air pollution from construction vehicle exhaust during construction. For these reasons, the project should have no significant adverse short-term or long-term impacts on local air quality. Similarly, the project will have no significant effect on local or regional energy use because it adds no significant energy consuming equipment

Noise from motorized construction equipment will be audible but similar to that of local traffic routinely transiting the greater project area. Traffic will be maintained in Berliner Park and adjacent areas during construction. Disruption to park traffic will be minimized by limiting the construction period to the "off-season." Public safety will be protected during construction by controlling traffic in the construction area using standard practices (flaggers, signs, barricades), and by covering or closing open trenches at the end of each work day. Local aesthetics will be unchanged after construction is completed and surface restoration (seeding, sodding, paving) occurs. For these reasons, no significant adverse short- or long-term impacts to noise, traffic, safety, or aesthetics are expected due to this project.

The Ohio Historic Preservation Office concurred with Ohio EPA's determination that this project will have no significant adverse effect on properties listed or eligible for listing in the National Register of Historic Places (archaeological and historical resources).

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

Local Economy

The proposed project will have no adverse on the local economy because it requires no local sewer rate increase beyond those currently planned for Columbus customers. Columbus's median household income (MHI) is \$37,897 and the average annual sewer bill is \$478, which is 1.26% of MHI. This is slightly above the Ohio average of 1.1% (the 2009 state average annual sewer bill, \$514, as a percentage of the 2000 Ohio MHI). Sewer bills below 1.8% of MHI are generally considered affordable.

Columbus's projected average annual user cost is within the range of surrounding communities, namely: Cleveland (population 478,403) - \$421, Cincinnati (population 331,285) - \$578, and Toledo (population 313,619) - \$370. The population of Columbus is 711,470.

By using the WPCLF low-interest financing for this project, Columbus has minimized the cost and the economic impact on customers.

D. Public Participation

The Columbus Division of Sewerage and Drainage web page carried a fact sheet and request for public comment on this project during 2010 and early 2011. No comments were received. Ohio EPA is unaware of controversy about or opposition to the project.

The following agencies reviewed this project's planning information:

Ohio Environmental Protection Agency
Ohio Historic Preservation Office
Ohio Department of Natural Resources
U.S. Fish and Wildlife Service

None of the review agencies opposes the project.

E. Reasons for a Preliminary Finding of No Significant Impact

Based on its review of the general plans and other information collected about 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 either 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 Columbus community, so no particular 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.

Ohio EPA expects the economic impact of the project on the average user to be insignificant because it requires no change to user rates.

The project is expected to eliminate sanitary sewer overflows and the associated human health threat in Berliner Park and adjacent areas.

For further information, please contact:

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