

November 21, 2022

Limited Environmental Review and Finding of No Significant Impact

City of Columbus - Franklin County
Manchester Avenue Water Line Improvements
Loan number: FS390274-0339

The attached Limited Environmental Review (LER) is for a water infrastructure improvement project in Columbus which the Ohio Environmental Protection Agency intends to finance through its Water Supply Revolving Loan Account (WSRLA) 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 WSRLA 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,

Kathleen Courtright, Assistant Chief

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Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Manchester Avenue Water Line Improvements

City of Columbus Applicant:

> Department of Public Utilities 910 Dublin Road, 4th Floor Columbus, Ohio 43215

Loan Number: FS390274-0339

Project Summary

The City of Columbus is requesting a \$1 million low-interest loan from the Ohio Water Supply Revolving Loan Account (WSRLA) to replace the water distribution system along Manchester Avenue.

History & Existing Conditions

Columbus operates an extensive water treatment and distribution system that serves the city and most of Franklin County, delivering 50 billion gallons of water per year to its service area. Prior to treatment, water is sourced from reservoirs, wells, rivers, and creeks.

Columbus has water lines that are deteriorated and in need of replacement to reduce regular repairs. If not addressed, the flow and water quality of the lines will decrease. Water line breaks will continue and require more costly maintenance.

The Hap Cremean Water Plant draws water from Big Walnut Creek and delivers treated drinking water to those living along Manchester Avenue and Dresden Street. The existing water lines vary in size and require repeated maintenance. Each watermain break costs \$5,000 to repair.

Project Description

The City of Columbus will install new ductile iron water lines that have an estimated service life of 100 years. This project involves 14,903 feet of waterline replacement, upsizing smaller lines, looping the discontinued lines with 6" and 8" PVC lines, 28 new fire hydrants, and 60 new valves to isolate lines. In addition, 660 feet of existing 6" waterline relocation on U.S.52 is included in the project to avoid further waterline breaks because of the existing slide and washout conditions of the shoulder on U.S. 52 eastbound lane.

The construction footprint for this project will remain within the previously disturbed right-of-way alongside and within the roadway, thereby minimizing effects on environmental resources.

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Implementation

The City of Columbus is requesting \$1 million from the WSRLA. Columbus qualifies for a standard 3.01% interest rate for a 20-year loan. This will save the city \$157,467 for the life of the loan compared to the market rate of 4.26%. 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 average Columbus residential water bill is approximately \$534/year, which is 1.2 % of the MHI and is less than the state average of \$697.

There is no expected increase in the average residential water bills directly related to this project. By using WSRLA financing for this project, Columbus has minimized the economic impact on customers.

The current construction schedule is to begin work by early 2023 and be complete by the end of June 2024.

Public Participation

Annual notices of water line rehabilitation and replacement projects are posted on the Division of Water's web site. Notices will be distributed to affected residents prior to construction. The public will have the opportunity to review the legislation prior to City Council approving the funds for the project.

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 water distribution system, which involves the functional replacement of and improvements to existing water 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 the project includes replacement of water lines within the previously disturbed rights-of-way alongside or within the roadway; 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. Any tree clearing will occur within seasonal clearing dates to protect endangered bat species located in the area. Dust, traffic, and noise will be controlled and restricted to normal working hours. Erosion and sediment control will be handled by temporary erosion and sediment control devices such as silt fence, inlet protection, and temporary seeding.

Is cost effective as the overall costs and benefits of replacement of the water mains outweigh the temporary advantages of rehabilitation. Taking no action would allow the flow and water quality of the existing main to decrease and continue to accumulate maintenance costs, which average \$5,000 per break.

City of Columbus November 2022 Manchester Avenue Water Line Improvements Page 2 **Is not a controversial action** because the project will solve watermain breakage problems without raising water rates. DEFA is unaware of any specific opposition to or controversy about this project that will improve the safety and efficiency of a continuous supply of potable water to customers.

Does not create a new, or relocate an existing discharge to surface or ground waters, does not create a new source of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing water source, or substantially increase the volume of discharge or 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 just replaces a water line for existing customers and does not otherwise alter Columbus's public water system (withdrawal, treatment, distribution, or usage of potable water).

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.

This project will help to ensure the safety and efficiency of water distributed to the Columbus area.

Contact information

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Figure 1. Location of the proposed water line replacement along Manchester Avenue. The map also shows where there were multiple water line breaks.

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