



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

April 4, 2022

**Limited Environmental Review and Finding of No Significant Impact**

**City of Columbus – Franklin County  
2021 Annual Lining Contract  
Loan number: CS390274-0353**

The attached Limited Environmental Review (LER) is for a sewer lining 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,

*Kathleen Courtright*

Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Name: 2021 Annual Lining Contract

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

Loan Number: CS390274-0353

### **Project Summary**

The City of Columbus in Franklin County has requested \$3,190,317 from the Water Pollution Control Loan Fund (WPCLF) for ongoing annual rehabilitation of existing sanitary/combined sewers and manholes. Construction will take place within the footprint of the existing sewer lines, therefore limiting potential impacts to environmental features. The project is intended to reduce discharges to the Scioto and Olentangy rivers.

### **History and Existing Conditions**

Columbus has combined sewers (pipes that in dry weather carry sanitary sewage only, and during wet weather carry sanitary flows combined with storm drainage). When flows rise dramatically during and after rainfall, combined sewer overflows (CSOs) divert untreated sanitary sewage mixed with storm water to area streams. Such discharges pose a threat to human health and the environment.

Inflow and infiltration (I/I) contribute to CSOs in Columbus. Inflow is surface runoff that enters sanitary sewers through directly connected downspouts, area drains, etc. Infiltration is the ground water that seeps into sanitary sewers through cracks, offset joints, and other flaws in the pipe. The sanitary infrastructure within Columbus includes miles of older sewer lines that have outlived their useful service life. These sewers are more prone to leaks and/or failures that may occur unexpectedly. Columbus is under a federal consent decree to reduce CSOs and to maintain annual rehabilitation of combined sewers in poor condition contributing to current CSO conditions.

Sanitary sewers are televised by the Columbus Sewer Maintenance Operation Center to perform I/I studies. While the sewer is being televised, structural issues (cracks, fractures, holes, collapses, etc.) and maintenance issues (roots, inflow, deposits, etc.) are coded and recorded by the Pipeline Assessment Certification Program (PACP). With the aid of a sewer condition assessment tool, the sewers are prioritized to determine which segments will be included in the Annual Lining Contract.

### **Project Description**

The project will rehabilitate existing sanitary/combined sewers utilizing cured-in-place pipe (CIPP) methods and rehabilitate existing sanitary/combined manholes by cementitious lining. A list of identified sewer sections to be rehabilitated throughout various locations of Columbus was created from previous I/I studies and will include over 47,000 linear feet of 8-inch to 18-inch diameter sewers and 300 manholes. Sewers in poor condition will be rehabilitated to correct numerous cracks,

fractures, offset joints, and holes that allow for I/I. The final results of this project will reduce I/I in Columbus' sanitary/combined sewer systems. This improvement will reduce water-in-basement events and overflows, thereby reducing the biological and toxic pollutants entering the Scioto and Olentangy rivers. Both rivers are currently designated as Warmwater Habitat (WWH) Aquatic Life Use in Ohio Water Quality Standards. Removal of this discharge could contribute to maintaining water quality.

The construction footprint for this project will remain within the confines of the existing sanitary sewer lines, therefore minimizing effects on environmental resources. No tree clearing will occur as a result of this project and aquatic habitat will not be impacted. The contractor is responsible for best management practices to control erosion and sedimentation and maintain local traffic during construction.

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

### **Implementation**

#### *Project Costs*

Columbus plans to borrow \$3,190,317 from the WPCLF. During the 20-year loan period Columbus will save approximately \$447,850 by using WPCLF dollars at the standard rate of 0.86%, compared to the market rate of 2.11%.

Interest rates are set monthly and may change for the requested April loan award.

#### *Local Economy*

The current Columbus residential sewer bill is approximately \$605/year. Projected residential sewer bills with the implementation of this and other associated projects are expected to increase to approximately \$753/year, which is approximately 1.4% of median household income (MHI) of Columbus, which is \$53,745.

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

#### *Project Schedule*

The anticipated loan award will occur in April 2022. Construction is expected to begin immediately and be completed by November 2023.

### **Public Participation**

A public notice was posted on the City of Columbus' Public Utilities webpage detailing the proposed project and contact information is provided for any public questions or concerns. Area residents will receive notifications prior to the work being performed. The notifications will give information on timing of the work, contact information, and a request to restrict water usage for a short time (8-10 hours) while the sewer main is being lined.

Ohio EPA will make a copy of this document available to the public on its web page: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements> and will provide it upon request to interested parties. Information supporting this Limited Environmental Review (LER) is available from the project contact named below.

## **Conclusion**

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater treatment system, which involves the functional rehabilitation of and improvements to existing equipment. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

### **Will have no significant environmental effect, no effect on high value environmental resources, and does not require extensive specific impact mitigation.**

All project work will occur within the footprint of the existing sewer lines within rights-of-way in highly urbanized areas. Standard construction best management practices will be used to control dust, erosion and sediment runoff, noise, and traffic disruption.

### **It is cost effective and not controversial.**

The proposed project is cost effective as it involves the necessary rehabilitation of sewer lines to allow for more efficient operation. This project will decrease combined sewer overflows by targeting sewers that have been identified as having structural and maintenance issues. Rehabilitating sewers using CIPP lining methods is a cost-effective alternative compared to open-cut sewer replacement and is much less disruptive to residents, motorists, and the environment. Ohio EPA is unaware of any opposition to this project that will improve the efficiency of the city's sewer system and decrease discharges to the Scioto and Olentangy rivers.

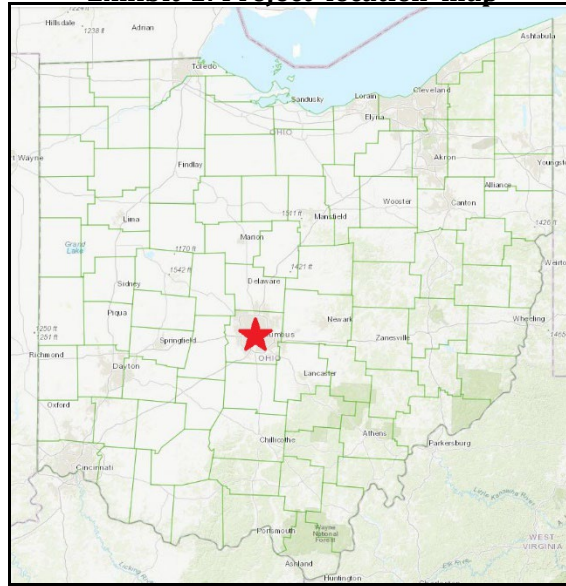
### **Does not create a new, or relocate an existing discharge to surface or ground waters, and will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities or receiving waters; and will not provide capacity to serve a population substantially greater than the existing population.**

This project involves the routine rehabilitation of sewer lines and does not otherwise alter Columbus' sewer system. This project will not increase the city's present sewer system capacity, nor facilitate an expansion of service.

## **Contact information**

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**Exhibit 1: Project location map**



**Exhibit 2: Project location map**

