



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

May 3, 2021

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

**Re: City of Columbus
Portage Grove Area Assessment Sanitary Sewer
WPCLF Loan No.: CS390274-0148
Finding of No Significant Impact**

Dear Ms. Davies:

On April 1, 2021, Ohio EPA issued a draft Finding of No Significant Impact (FNSI) for the City of Columbus – Portage Grove Area Assessment Sanitary Sewer 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This final Finding of No Significant Impact may be revised or rescinded at a future date based upon either changes to the proposed project, the presentation of information which significantly alters earlier conclusions, or failure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

April 1, 2021

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

**City of Columbus – Franklin County
Portage Grove Area Assessment Sanitary Sewer
Loan Number: CS390274-0148**

The attached Environmental Assessment (EA) is for a sanitary 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, as stated in the Ohio Administrative Code (OAC) 3745-150-06.

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 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 to receive and consider comments. 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 – Portage Grove Area Assessment Sanitary Sewer

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

Loan Number: CS390274-0148

Project Summary

The City of Columbus in Franklin County has requested \$2,640,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) to provide new sanitary service to the Portage Grove area and eliminate the use of household sewage treatment systems (HSTS).

Extending sanitary sewer service to this 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 Portage Grove area consists of three main locations that will be serviced by this project:

- 1) The first area contains 20 houses on about 15 acres located along Northport Drive and Northport Circle. The area will be serviced by two new sanitary sewer extensions from existing manholes located in the rear yards of 1370 Northport Drive and 1293 Northport Circle.
- 2) The second area contains 24 houses on about 17 acres located along Portage Drive, Southport Drive, and Southport Circle. This area will be serviced by one new sanitary sewer extension from an existing manhole located in the rear yard of 1277 Southport Drive.
- 3) The third area contains two houses on about two acres located along Godown Road south of Southport Drive. This area will be serviced by one new sanitary sewer extension from an existing manhole located in the rear yard of 5340 Godown Road.

Single-family residential homes within this 33.8 acre fully developed area are currently serviced by 46 HSTS. This area is considered high priority 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 Portage Grove area will eliminate 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. Further expansion within or adjacent to this area is not expected.

Alternatives

- *No action*: Doing nothing, the “no-action” alternative, would continue to allow for the area’s wastewater to be treated by HSTS. As these systems 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 Portage Grove area can connect to the city’s existing wastewater system through installation of a new sanitary sewer. Various alternatives were considered based on two proposed alignments:
 - Northport Drive and Northport Circle: The total length of the proposed sanitary sewer main to service this portion of the assessment area would be about 1,950 feet long and it will involve the construction of 12 new manholes.
 - *Option 1*: The proposed 8-inch sanitary sewer mains would be routed between houses to get to these streets then the sanitary sewer would be installed under the roadway pavement.
 - Advantages: Only three additional easements would need to be obtained to complete the work in this area; this alignment limits the disruption to trees or private property to complete the work.
 - Disadvantages: The proposed sanitary sewer would be located under the pavement, which would require extensive repaving work to be completed.
 - *Option 2*: The proposed 8-inch sanitary sewer mains would be routed between houses to get to these streets, then the sanitary sewer would be installed adjacent to the pavement within the right-of-way and proposed easements.
 - Advantages: Since the sewer work is limited within the pavement area to crossings, the amount of pavement replacement is greatly reduced; work is located mostly outside the roadway thus limiting the disruption to local traffic; the construction cost of the project would be significantly lower than Option 1.
 - Disadvantages: Requires easements from 11 properties; requires the removal of many large, mature trees; the proposed sanitary sewer along this side of the road would be located in the front yards of residential properties where the project would impact many existing trees or cause significant inconvenience to property owners and impact to property values.
 - Southport Drive, Southport Circle, and Portage Drive: The total length of the proposed sanitary sewer main to service this portion of the assessment area would be about 2,200 feet long and will involve the construction of 12 new manholes.
 - *Option 1*: The proposed 8-inch sanitary sewer mains would be routed between houses to get to these streets, then the sanitary sewer would be installed under the roadway pavement.

- Advantages: Only seven new easements would need to be obtained to complete the work in this area; this alignment limits the disruption to trees or private property to complete the work.
 - Disadvantages: The proposed sanitary sewer would be located under the pavement, which would require extensive repaving work.
- *Option 2:* The proposed 8-inch sanitary sewer mains would be routed between houses to get to Southport Drive, Southport Circle, and Portage Drive, and then the sanitary sewer would be installed adjacent to the pavement within the right-of-way and proposed easements.
 - Advantages: Only seven new easements would need to be obtained to complete the work in this area; since the sewer work is limited within the pavement area to crossings, the amount of pavement replacement is greatly reduced; work is located mostly outside the roadway thus limiting the disruption to local traffic; the construction cost of the project would be significantly lower than Option 1.
 - Disadvantages: Requires the removal of many large, mature trees; the proposed sanitary sewer along this side of the road would be located in the front yards of residential properties where the project would impact many existing trees or cause significant inconvenience to property owners and impact to property values; conflicts with existing gas service lines in several areas.
- Godown Road:
 - *Option 1:* The proposed 8-inch sanitary sewer main extension would be routed along a proposed easement for approximately 150 feet. This is the only feasible option for this portion of the project.
 - Advantages: Only two easements would need to be obtained to complete the work in this area; this alignment limits the amount of trees or private property disrupted in order to complete the work.
 - Disadvantages: Access to the rear yard to complete the construction work might damage trees, shrubs, or other residential property that is unrelated to the immediate project area.

Selected Alternative

After considering the social, economic, and constructability of each design, Columbus elected to move forward with the alignment detailed in Option 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 Portage Grove. Option 1 is the chosen recommendation because it has less impact on private property and the existing mature look of the neighborhood, despite being more costly. Option 2 requires obtaining eight more easements than Option 1, which could lead to delays in the actual construction of the project. Option 2 would also require the removal of many mature trees and conflict with existing utilities more than Option 1. Following the proposed alignment, this project will extend existing sanitary sewers and provide a new residential sanitary service tap for 67 existing homes which are served by HSTS.

All involved streets contain single-family residential and commercial properties as well as existing water mains and other utilities. Although construction work will primarily be confined to existing roadways and rights-of-way, an extensive number of trees will potentially be impacted by construction. Additionally, the project area contains Turkey Run, a tributary of the Olentangy River, which will be temporarily impacted by open trenching to complete the sewer line installation.

Implementation

Project Costs

Columbus plans to borrow \$2,640,000 from the WPCLF to finance the project. During the 20-year loan period Columbus will save approximately \$364,983 by using WPCLF dollars at the Standard Rate of 0.60%, compared to the market rate of 1.85%.

Project Schedule

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

Public Participation

A public meeting was held with area residents on April 11, 2018. 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.

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 mostly 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

Existing traffic patterns on Godown and West Case Roads will be impacted and will be coordinated with Paving the Way. During construction, the contractor will be required to maintain local access for residents. 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

According to a review of project planning and design and the Ohio Wetlands Inventory, a tributary of the Olentangy River, identified in project plans as Turkey Run, is present and drains 0.7 square mile. Work consists of open trenching through Turkey Run to install the sewer line connection, a temporary impact that will be restored at the completion of the project.

Coordination with Ohio EPA's Division of Surface Water included a request to impact 20 linear feet of the stream for the purpose of constructing a sanitary sewer. Ohio EPA has determined that the impacts to water quality are minimal. An individual 401 Water Quality Certification (WQC) is not necessary provided all other terms and conditions of the 401 WQC certifying the Nationwide Permit (NWP) have been met.

An Ohio EPA General Storm Water National Pollutant Discharge Elimination System (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 \$720/year. This is 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 Portage Grove 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

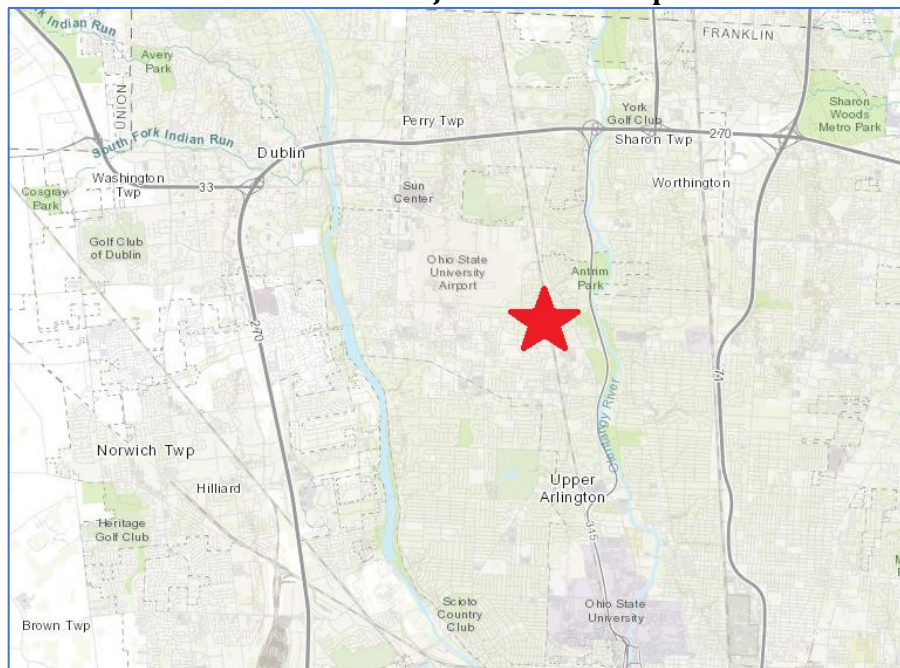


Exhibit 3: Project Location Map

