Ohio Environmental Protection Agency

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

February 7, 2022

Ann Aubrey, P.E., Interim Utilities Director
City of Columbus
910 Dublin Road
Columbus, OH 43215

Re: City of Columbus
Barnett/E. Deshler HSTS Elimination
Loan Number: CS390274-0404
Finding of No Significant Impact

Dear Ms. Aubrey:

On January 3, 2022, Ohio EPA issued a draft Finding of No Significant Impact (FNSI) for the City of Columbus – Barnett/E. Deshler 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 preliminary FNSI become the basis for this final FNSI 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This final Finding of No Significant Impact may be revised or rescinded at a future date based upon either changes to the proposed project, the presentation of information which significantly alters earlier conclusions, or failure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,

Kathleen Courtright

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Ohio Environmental Protection Agency

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

January 3, 2022

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

City of Columbus – Franklin County
Barnett/E. Deshler HSTS Elimination
Loan Number: CS390274-0404

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, Chief
Division of Environmental & Financial Assistance

Attachment

ENVIRONMENTAL ASSESSMENT

Project Identification

Project Name: Barnett/E. Deshler HSTS Elimination

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

Loan Number: CS390274-0404

Project Summary

The City of Columbus in Franklin County has requested $820,538 from the Ohio Water Pollution Control Loan Fund (WPCLF) to provide new sanitary service to the Barnett Road/East Deshler Avenue 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 bacteria growth in surface water. Construction for this project will occur alongside roadways in existing public rights-of-way.

History and Existing Conditions

This project was initiated to provide sanitary sewer service to a previously developed, un-sewered area currently served by HSTS. Construction of this project will provide sanitary sewer service to 16 residential homes within the city limits. This will eliminate the need for existing HSTS which are prone to failure over time and can result in a public health risk by polluting rivers and streams.

The project area is bounded by East Deshler Avenue to the north, Bexvie Avenue to the south, Coburg Road to the east, and Zettler Road to the west. The proposed mainline sewer project will include an anticipated 16 lateral connections in an area containing a significant amount of existing utilizes, including sanitary sewers, water service, storm sewers, overhead electric and communication lines, street lighting, and buried gas lines.

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

Population and Flow Projections

Prior analysis of the proposed project determined there will be nominal impact to the existing downstream sewers; therefore, there is capacity for the proposed sanitary sewer flows from the 16 properties. The Barnett/E. Deshler area has minimal future additional flow concerns, aside from the potential future expansion of properties currently listed as churches. However, the church properties are limited in expansion due to their size and location. For these reasons, potential future expansion in the project 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 and often failure 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 located within the Barnett/E. Deshler area can connect to the city's existing wastewater system through installation of a new sanitary sewer. Three mainline sanitary sewer alternatives were developed for comparison utilizing the best available engineering, social, and economic solutions.
    a) *Alternative 1 (Roadway Alignments)* is based upon open-cut construction of three alignment segments in each of the roadways of East Deshler Ave., Barnett Rd., and Bexvie Ave. This is the least expensive option, primarily due to the pavement replacement in only one lane for each of the three roadways. This will only require one small easement on private property, so it minimizes disruption to property owners.
    b) *Alternative 2 (Front Yard Alignments)* is similar in pipe length and hydraulics to Alternative 1 but proposes open-cut construction of the mainline sewer segments in the front yards of the homes along East Deshler, Barnett, and Bexvie just outside of their associated right-of-way lines. Disruption to properties in the project area would be high due to the proposed pipes interfering with existing above-ground front yard features such as driveways, mailboxes, landscaping, fencing, and light fixtures. Construction would depend upon purchasing easements from property owners in the project area.
    c) *Alternative 3 (Rear Yard Alignments)* differs in that it involves constructing mainline sewer pipes in both the backyards and front yards of the homes being served and necessitates breaking the mainline sewer into five different sections with alternative connection points. Open cut construction along the backyards in the project area would mean removal of a considerable number of mature trees. Construction would depend upon purchasing easements from property owners.

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 household sewage treatment systems in the area, while minimizing disruption to residents at an optimized cost.

This alignment will install new sanitary sewer service to residents in the previously developed area along E. Deshler Ave., Barnett Rd., and Bexvie Ave. Hydraulic calculations indicate that an 8-inch diameter sanitary sewer pipe will be adequate to conduct the sanitary flow for the 16 project homes. Open-cut construction and installation of 8-inch PVC pipe will be utilized. The proposed 8-inch diameter sewer will connect to the existing sanitary sewer on E. Deshler Ave. and on Bexvie Ave.

This alternative was selected as alignments within the public right-of-way are preferable to purchasing easements. Alternatives 2 and 3 are moderately more expensive, primarily due to the fact that they necessitate private property easement acquisition, which would cause extensive disruption to residents. Alternatives 2 and 3 would also require the construction of additional sewer lines to connect to existing sewers, as well as tree removal since the previously disturbed right-of-way would not be utilized for construction. The decreased costs associated with constructing Alternative 1 in

the roadways and the benefits of avoiding expensive utility easement acquisition, make Alternative 1 the best choice.

Implementation

Project Costs
Columbus plans to borrow $820,538 from the WPCLF to finance the project. During the 20-year loan period Columbus will save approximately $113,508 by using WPCLF dollars at the standard rate of 0.61%, compared to the market rate of 1.86%.

Project Schedule
The anticipated loan award will occur in February 2022. Construction is expected to be completed by September 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.

Ohio EPA will make a copy of this document available to the public on its web page: https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements 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.

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 $753/year. This is approximately 1.5% of the median household income (MHI) of Columbus, which is $51,612.

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.

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 of the Barnett/E. Deshler area and will eliminate the potential for environmental and public health hazards as a result of faulty HSTS.

Contact information

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

Exhibit 1: Project location map

Exhibit 2: Project location map

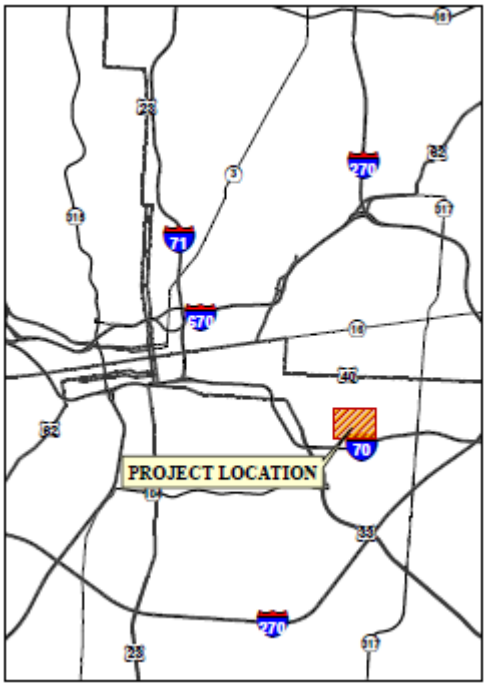

Exhibit 3: Project location map