

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

April 12, 2022

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

Re: City of Columbus Dyer-Lazar HSTS Elimination Loan Number: CS390274-0372 Finding of No Significant Impact

Dear Ms. Aubry:

On March 8, 2022, Ohio EPA issued a draft Finding of No Significant Impact (FNSI) for the City of Columbus – Dyer-Lazar 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This final Finding of No Significant Impact may be revised or rescinded at a future date based upon either changes to the proposed project, the presentation of information which significantly alters earlier conclusions, or failure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



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

# March 8, 2022

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

## City of Columbus – Franklin County Dyer-Lazar HSTS Elimination Loan Number: CS390274-0372

The attached Environmental Assessment (EA) is for a HSTS elimination 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 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,

Kathleen Courtright

Kathleen Courtright, Assistant Chief Division of Environmental & Financial Assistance

Attachment

#### **ENVIRONMENTAL ASSESSMENT**

## Project Identification

Project Name: Dyer-Lazar HSTS Elimination

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

Loan Number: CS390274-0372

## Project Summary

The City of Columbus in Franklin County has requested \$2,040,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) to provide new sanitary service to the Marsh Run area along Dyer and Lazar roads 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 ground water contamination. 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 48 properties in the Marsh Run area. 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 Dyer-Lazar project focuses on 48 unserved properties spread out across a 304-acre service area. Marsh Run Creek bisects the service area into distinct north and south sections. The project area is bounded to the south by Interstate 270 and to the east by Interstate 71. The service area has been organized into four sub-areas: the six properties near the west end of Dyer Road, 26 properties to the south and two properties north of Marsh Run along Tanis Drive and Lazar Road, eight properties near Brown Road, and six properties near the Sussex Place Subdivision on the east end of Dyer Road. The proposed project area contains a significant amount of existing utilizes, including sanitary sewers, water service, storm sewers, overhead electrical and communication lines, street lighting, and buried gas lines.

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

## **Population and Flow Projections**

The project area site is comprised of a combination of open space and residential development. Developable open space is currently located in Franklin County north of the intersection of Dyer and Lazar Roads. Columbus has requested this area be considered for future service during this project.

Future growth projections were taken into account during the development and design of this project.

# <u>Alternatives</u>

- *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 Marsh Run area can connect to the city's existing wastewater system through installation of a new sanitary sewer. Sanitary sewer location alternatives were evaluated for each section of the project based on any constraints and construction costs.

# Selected Alternative

Columbus elected to move forward with the construction of new sanitary sewer service within the project area. This project will extend sanitary sewer in Dyer Road, Lazar Road, Tanis Road, and Brown Road. This system will connect to the existing Marsh Run Subtrunk Sewer which was constructed in 2001 west of Interstate 71, south of Dyer Road, along Marsh Run to Grove City.

The new sanitary sewer extension will serve this developed area that is currently served by home sewage treatment systems (HSTS). The project will eliminate the HSTS due to the potential of the ground water contamination hazard, as the home treatment systems can leach into the ground water table.

# **Implementation**

# Project Costs

Columbus plans to borrow \$2,040,000 from the WPCLF to finance the project. During the 20-year loan period Columbus will save approximately \$286,371 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.

# Project Schedule

The anticipated loan award will occur in April 2022. Construction is expected to be completed by the end of 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: <u>https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-</u>

<u>assistance/announcements</u> 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.

## <u>Air Quality</u>

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 State Historic Preservation Office (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. Any necessary tree clearing within the project area is scheduled to occur within seasonal clearing dates to protect potential habitat for the Indiana bat. 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, there is no prime farmland located within the project area, so no farmland losses are expected as a result of this project.

#### **Floodplains**

According to project planning and design, construction will avoid impacting any area located inside

the FEMA floodplain boundary.

## 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.

Marsh Run Creek runs through the project area. Special consideration has been placed on avoiding impacts to the creek that may necessitate a US Army Corps of Engineers nationwide permit, such as the use of horizontal directional drilling.

Designated Wild and Scenic Rivers will be unaffected by this project as there are none located within the project's vicinity.

## <u>Wetlands</u>

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.

## <u>Energy Use</u>

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 city 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 approximately 1.4% of the median household income (MHI) of Columbus, which is \$51,612.

## <u>Conclusion</u>

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 Dyer-Lazar/Marsh Run 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 2: Project location map** 



# Exhibit 3: Project location map

