Ohio Environmental Protection Agency

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

June 8, 2021

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

Re: City of Columbus
Rickenbacker Intermodal Sanitary Extension Project
WPCLF Loan No.: CS390274-0363
Finding of No Significant Impact

Dear Ms. Davies:

On May 5, 2021, Ohio EPA issued a draft Finding of No Significant Impact (FNSI) for the City of Columbus – Rickenbacker Intermodal Sanitary Extension 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This final Finding of No Significant Impact may be revised or rescinded at a future date based upon either changes to the proposed project, the presentation of information which significantly alters earlier conclusions, or failure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

Ohio Environmental Protection Agency

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

May 5, 2021

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

City of Columbus – Franklin County
Rickenbacker Intermodal Sanitary Extension Project
Loan Number: CS390274-0363

The attached Environmental Assessment (EA) is for a pump station elimination and sanitary sewer extension 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: Rickenbacker Intermodal Sanitary Extension Project

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

Loan Number: CS390274-0363

Project Summary

The City of Columbus in Franklin County has requested $5,830,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) to construct a gravity sewer to maintain and expand sanitary service to the Rickenbacker International Airport area and enable the abandonment of pump station SA-18 located along the northwestern edge of the airport.

Abandonment of the pump station and replacement with a conventional gravity system requires much lower operation and maintenance cost, lower life cycle replacement cost, lower energy demands, and lower risk of outages. It also allows for the abandonment of aging assets prone to failure such as pump stations and force mains.

Construction for this project will occur alongside roadways and public rights-of-way with existing utilities. Due to the industrial nature of the area, no residents will be impacted by the project construction.

History and Existing Conditions

The project area consists of Rickenbacker Parkway along the southwest border of Rickenbacker International Airport and Air Force Base located ten miles south of downtown Columbus and east of the village of Lockbourne in southern Franklin County. The south end of the airport extends into Pickaway County. Most of the properties along Rickenbacker Parkway are owned by the Columbus Regional Airport Authority (CRAA).

Currently within the project area are 4-inch, 8-inch, and 12-inch sanitary sewers. The sewers are all located within airport property and eventually all flow to pump station SA-18 at the intersection of Rickenbacker Parkway and south Perimeter Road. A 10-inch force main exits the pump station and flows north, discharging into the Big Walnut Outfall Augmentation Sewer, for treatment at Southerly Wastewater Treatment Plant.

To prepare for anticipated development within the area, the 10-inch force main will be eliminated and replaced with a larger gravity sewer equipped to handle a greater capacity of sanitary waste. The pump station will be demolished as a part of this process so as to eliminate any risk of future failure.

Storm sewers, water lines, gas lines, and underground electric are also present within the project vicinity. Maps of the project area are provided in the exhibits below.

Population and Flow Projections

Apart from military and civilian aerospace usage, the remaining portion of the project area is largely agricultural. Industrial development is anticipated in this area and Columbus has been expanding its sewer system to meet future service needs. In 2018, the 60-inch Lockbourne Intermodal Subtrunk was constructed along Ashville Pike and Circleville Lockbourne Road to service the area south of the airport.

Alternatives

The location of the proposed sewer is within or along the Rickenbacker Parkway right-of-way. Factors considered during the preliminary design of the proposed alignment alternatives include the upstream and downstream connection points, utility and right-of-way constraints, and environmental permitting.

Two alignment alternatives were developed to minimize additional project costs and schedule delays associated with construction and easement acquisition, while avoiding impacts to Rickenbacker Parkway which is a major road for intermodal transport. Both follow the same path from pump station SA-18 for approximately 2,400 linear feet and include two trenchless road crossings proposed to avoid open-cut construction across culverts and streams. Both alignments are located within the public right-of-way for open-cut portions at the northern bend in Rickenbacker Parkway. This portion of both alignment alternatives is constrained on the west side of the road by two jurisdictional streams, the Norfolk Southern Railroad, and an 8-inch gas main and utility poles within the right-of-way. The right-of-way space east of Rickenbacker Parkway is limited by the military base fencing and a 24-inch water main. Additionally, multiple culverted streams cross beneath the road creating sewer depth constraints. Once beyond the northern bend in Rickenbacker Parkway, the proposed alignment splits into two alignment alternatives:

- Alignment 1 immediately crosses to the west side of the road via trenchless construction and stays within the right-of-way until the southern connection point with the Lockbourne Intermodal Subtrunk. Trenchless construction is proposed from the road crossing until the last culvert crossing to avoid impact to the culverts, road, railroad, and streams.
- Alternative 2 remains on the east side of the road, going just outside of the right-of-way into CRAA property, to maintain appropriate distance from the water main and provide extra room for open cut construction at depth.

Additionally, potential tributary development alternatives in the Rickenbacker Airport area and surrounding developable land were evaluated to provide options for the sizing of the proposed sewer, depending on the anticipated development of the Rickenbacker Airport area and future flow.

Selected Alternative

While Alignment Alternative 1 avoids the water main and additional easements by remaining on the west side of Rickenbacker Parkway past the northern bend in the road, it will likely require trenchless construction methods for approximately half of the alignment, driving construction costs up. Alignment Alternative 2 also avoids the water main by running approximately 25 feet east of it,

outside of the right-of-way. This alignment avoids additional culvert crossings and stream impacts and therefore minimizes the need for trenchless construction. The cost of additional easements with this alternative will likely be less than the cost of additional trenchless construction with Alignment 1, making it the recommended alternative.

After considering the constructability and cost effectiveness of each design, Columbus elected to move forward with the alignment detailed in Alternative 2. The proposed sewer alignment will begin near the location of existing pump station SA-18 at the intersection of Rickenbacker Parkway and South Perimeter Road and connect to the current upstream end of the Lockbourne Intermodal Subtrunk, located near the intersection of Thoroughbred Drive and Rickenbacker Parkway, which sends sanitary sewer flow to the Southerly Wastewater Treatment Plant. The proposed alignment consists of approximately 6,000 linear feet of 15-inch to 24-inch sanitary sewer and will include the demolition of pump station SA-18.

Implementation

Project Costs
Columbus plans to borrow $5,830,000 from the WPCLF to finance the project. During the 20-year loan period Columbus will save approximately $806,004 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 summer 2021. Construction is expected to begin following the loan award and be completed by August 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.

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 the risk of environmental hazards through the elimination of pump station, the project is not expected to lead to 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

No historic properties are present within the construction area. 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 will be impacted. A traffic plan has been developed by the contractor prior to commencing construction which includes all proper warning signs and lane closures. The contractor will minimize both the extent and duration of the disruption of traffic and disturbance to the neighborhood during construction. Due to the industrial nature of the area, no residents will be impacted by the project 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

A Wetland and Waterbody Delineation study was performed and identified four streams within the project area, totaling approximately 1,015 linear feet. Three of the identified streams were classified as intermittent streams and one was classified as ephemeral. The largest stream flows parallel to the northern portion of Rickenbacker Parkway and receives flow from the three other streams via culverts under the road. The selected alignment alternative for this project avoids impacts to the largest stream and utilizes trenchless road crossings to avoid open-cut construction across the remaining culverts and streams.

The contractor will minimize soil from eroding or otherwise entering onto all paved areas and into natural watercourses and ditches.. Designated Wild and Scenic Rivers will be unaffected by this project as there are none located within the project's vicinity.

Wetlands

According to the aforementioned study, 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

Through eliminating the pump station and installing a conventional gravity sewer system, this project will reduce regional energy usage.

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 eliminate the risk of pump station failure and allow for future development in the area with a conventional gravity sanitary sewer system that uses less energy and requires less maintenance.

Contact

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Exhibit 1: Project location map

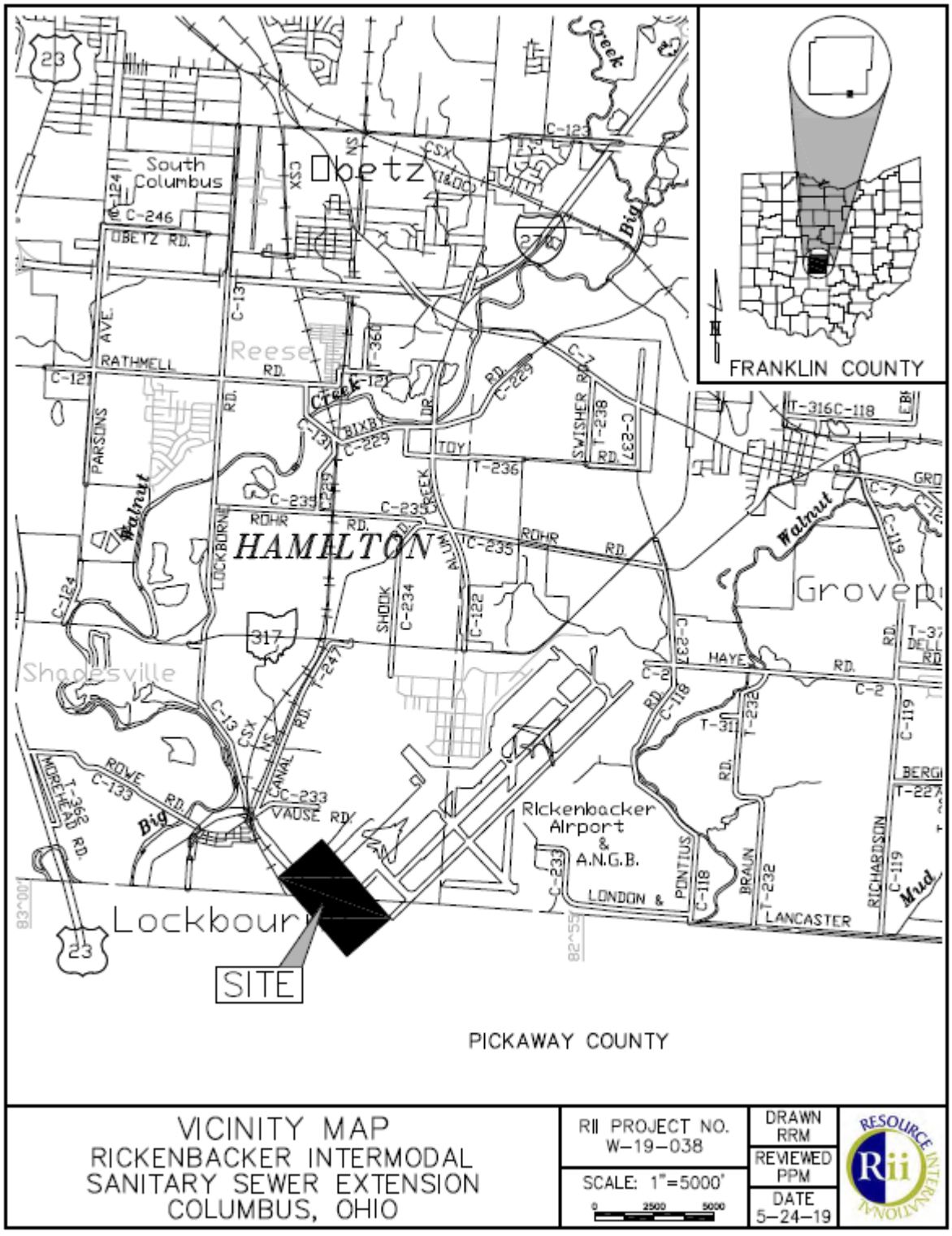

Exhibit 2: Project location map