



**Mike DeWine**, Governor  
**Jon Husted**, Lt. Governor  
**Anne M. Vogel**, Director

June 6, 2023

City of Columbus  
Attn: Kristen Atha, Public Utilities Director  
910 Dublin Road  
Columbus, OH 43215

Re: City of Columbus  
Brooklyn-Cleveland HSTS Elimination  
Loan Number: CS390274-0365  
Finding of No Significant Impact

Dear Ms. Atha:

On May 1, 2023, Ohio EPA issued a draft Finding of No Significant Impact (FNSI) for the City of Columbus – Brooklyn Cleveland 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This final Finding of No Significant Impact may be revised or rescinded at a future date based upon either changes to the proposed project, the presentation of information which significantly alters earlier conclusions, or failure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,

A handwritten signature in black ink that reads "Kathleen Courtright". The signature is written in a cursive, flowing style.

Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Anne M. Vogel, Director

May 1, 2023

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

**City of Columbus – Franklin County  
Brooklyn-Cleveland HSTS Elimination  
Loan Number: CS390274-0365**

The attached Environmental Assessment (EA) is for a household sewage treatment system 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,

A handwritten signature in cursive script that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief  
Division of Environmental & Financial Assistance

Attachment

## ENVIRONMENTAL ASSESSMENT

### **Project Identification**

Project: Brooklyn-Cleveland HSTS Elimination

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

Loan Number: CS390274-0365

### **Project Summary**

The City of Columbus in Franklin County has requested \$1,440,000 from the Ohio Water Pollution Control Loan (WPCLF) to extend sanitary sewer to Brooklyn Road and Cleveland Avenue. The new sanitary sewer extension will serve this developed area that currently treats wastewater with household sewage treatment systems (HSTS). Construction for this project will occur alongside roadways in existing public rights-of-way and within residential yards. This project is eligible for \$1,200,000 in principal forgiveness, which is a loan that does not need to be repaid.

### **History & Existing Conditions**

Construction of this project will provide sanitary sewer service to approximately 20 properties in the project area that are currently utilizing HSTS to treat wastewater. HSTS are prone to failure over time and can result in a public health risk by polluting rivers and streams. The properties were constructed between the 1920s and the 1970s.

The project encompasses the area immediately northwest of the Cleveland Avenue and Morse Road intersection. The project is bounded by Cleveland Avenue to the east, Bridgewood Court to the west, Morse Road to the south, and Northland Square Drive to the north. HSTS elimination will occur at 14 residential homes along Brooklyn Road and six businesses along Cleveland Avenue.

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

### **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 fail 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 businesses located within the Brooklyn-Cleveland area can connect to the city's existing wastewater system through installation of a new sanitary sewer. Sanitary sewer location alternatives were evaluated for the project based on construction costs, potential concerns with existing conditions, and the environmental impact.

### **Selected Alternative**

Columbus elected to move forward with the construction of new sanitary sewer service within the project area. This project includes the installation of approximately 1,612 linear feet of sanitary sewer main extension and the installation of approximately 20 sanitary sewer laterals. The sanitary sewer laterals will be installed from the proposed sanitary main to the edge of the right-of-way. Residents will be responsible for the decommissioning of their HSTS.

The new sanitary sewer extension will serve this developed area that is currently served by household sewage treatment systems (HSTS). Wastewater from new sanitary sewers will be transported to Columbus' Southerly Wastewater Treatment Plant for treatment.

### **Implementation**

#### *Project Costs*

Columbus requested \$1,440,000 from the WPCLF to finance the project. Columbus is eligible for \$1.2 million in principal forgiveness, which is a loan that will not need to be repaid. Columbus will borrow the balance at 0% interest.

#### *Project Schedule*

The anticipated loan award will occur in June 2023. Construction is expected to be completed by the summer of 2024.

### **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 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 and northern long-eared 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, 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 endangered bats. 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.

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 city is required.

### Local Economy

Columbus has minimized project costs by applying for principal forgiveness 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 \$777 per year. This is approximately 1.4% of the median household income (MHI) of Columbus, which is \$54,902.

### **Conclusion**

Based upon Ohio EPA's review of the planning information and the materials presented in this Environmental Assessment, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to the environmental features discussed previously. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts 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 and businesses of the Brooklyn-Cleveland 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, Ohio 43216-1049

Email: [kristin.parrish@epa.ohio.gov](mailto:kristin.parrish@epa.ohio.gov)

**Exhibit 1: Project location map**



**Exhibit 2: Project location map**

