Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

Notice of Issuance of a Limited Environmental Review and Final Finding of No Significant Impact to All Interested Citizens, Organizations, and Government Agencies

City of Columbus

Blueprint Clintonville Green Infrastructure Part 1
Blenheim/Glencoe Area
CIP 650870-100001
WPCLF Loan No.: CS390274-0217

Blueprint Clintonville Green Infrastructure Part 2A
Weisheimer/Indian Springs Area
CIP 650870-100002A
WPCLF Loan No.: CS390274-0218

Blueprint Clintonville Green Infrastructure Part 4
Overbrook/Chatham Area
CIP 650870-100002A
WPCLF Loan No.: CS390274-0230

The purpose of this notice is to advise the public that Ohio EPA has reviewed the above referenced project and finds that neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to complete the environmental review of the project. Instead, this project meets the criteria for a Limited Environmental Review (LER). These criteria are summarized below in this document and in the attached LER.

The Blueprint Clintonville Green Infrastructure Part 1Blenheim/Glencoe project will construct rain gardens along Blenheim, Northridge, and Chatham roads from High Street to Colerain Avenue, Acton Road from High Street to Indianola Avenue, Richards Road from Sharon Avenue to Indianola Avenue, and Fallis, Arden, and Glencoe roads from High Street to Granden Road. A large storm water wetland will also be constructed in Whetstone Park.

Blueprint Clintonville Green Infrastructure Part 2A Weisheimer/Indian Springs project will construct 42 rain gardens.

Blueprint Clintonville Green Infrastructure Part 4 Overbrook/Chatham project will construct 21 rain gardens throughout the Overbrook-Chatham area.

Green infrastructure will be installed on City property in neighborhoods, including the rights-of-way. Rain gardens will be constructed below street level, allowing rain water to flow in and filter slowly to the sewers underneath.

All three projects will be funded from low interest loans through Ohio EPA's Water Resource Restoration Sponsor Program (WRRSP).

The LER that was completed for this project found that it will not individually, cumulatively over time, or in conjunction with other Federal, State, local, or private actions have a significant adverse effect on the quality of the human environment. Consequently, a Finding of No Significant Impact can be issued now for this project.

The Water Pollution Control Loan Fund (WPCLF) program requires the inclusion of environmental factors in the decision-making process for project approval. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed action in its review and approval process. Environmental information was developed as part of the facilities planning process. A subsequent review by this Agency has found that the proposed action does not require the preparation of an EA or an SS.

Our environmental review concluded that because the proposed project is limited in scope and meets all applicable criteria, a Limited Environmental Review is warranted. Specifically, the project constitutes protection of existing high quality aquatic resources. Furthermore, the proposed project:

- has no significant environmental effect;
- does not require extensive specific impact mitigation;
- has no effect on high value environmental resources;
- is clearly cost effective;
- is not a controversial action;
- does not create a new, or relocate an existing discharge to surface or ground waters;
- will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters; and
- will not provide capacity to serve a population substantially greater than the existing population.

A map depicting the location of the project is included as part of the LER. The LER presents information on the proposed project, its costs, and the basis for our decision. Further information can be obtained by calling or writing the contact person listed on the back of the LER.

Upon issuance of this determination, a loan award may proceed without being subject to further environmental review or public comment, unless information is provided which determines that environmental conditions for the proposed project have changed significantly.

Sincerely,

Jerry Rouch

Jerry Rouch, Assistant Chief
Division of Environmental &Financial Assistance

JR/LM

Attachment

LIMITED ENVIRONMENTAL REVIEW

Projects: City of Columbus

Blueprint Clintonville Green Infrastructure Part 1
Blenheim/Glencoe Area
CIP 650870-100001
WPCLF Loan No.: CS390274-0217

Blueprint Clintonville Green Infrastructure Part 2A
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CIP 650870-100002A
WPCLF Loan No.: CS390274-0218

Blueprint Clintonville Green Infrastructure Part 4
Overbrook/Chatham Area
CIP 650870-100002A
WPCLF Loan No.: CS390274-0230

Applicant: Ms Tracie Davies, Director
Department of Public Utilities
910 Dublin Road
Columbus, Ohio 43215-9060

A. Proposed Project

1. Summary

The City of Columbus' Division of Sewerage and Drainage, in Franklin County, applied to Ohio EPA for financial assistance from the Water Pollution Control Loan Fund (WPCLF) to fund the Blueprint Clintonville Green Infrastructure (BP Clintonville) Part 1, 2B, and Part 4 projects. These projects are part of Blueprint Columbus which is an initiative to help address the 2002 sanitary sewer overflows (SSO) and the 2004 combined sewer overflow (CSO) consent orders issued by Ohio EPA. Blueprint encompasses the City's revisions to its Wet Weather Management Plan (WWMP). Project work includes the construction of storm water facilities to capture and treat existing stormflows and additional runoff generated by the infiltration and inflow remediation efforts being utilized to mitigate overflows of Designed Sewer Relief (DSR) 335 located in Whetstone Park.

The Blueprint Columbus plan (September 15, 2015) is a multi-pronged approach aimed at mitigating SSOs, basement back-ups (WIBs), and CSOs and improving stormwater quality prior to discharging it to area streams.

The cause of SSOs and WIBs is I/I (inflow and infiltration) entering the separate sanitary sewers, including private lateral service connections (the pipe running from the house to the public sanitary sewer), coupled with insufficient hydraulic capacity to transport it to treatment without overflows. The city has been studying I/I for years and has determined that the majority of it is entering the system from leaky pipes in older residential areas. The SSOs and WIBs will be addressed by removing I/I from the sanitary sewer system, allowing that system to function properly with fewer overflows or back-ups. The I/I removal will be accomplished by three technologies involved in Blueprint: rehabilitating sewer pipes (city owned and private laterals), redirection of roof water away from houses to protect the foundation drain, and a voluntary sump pump program. Stormwater quality is addressed by a fourth technology: green infrastructure, which includes rain gardens (bioretention basins) and porous pavement. The city refers to these components as the "four pillars."

The DSR 335, located in Whetstone park, is the focus of the Clintonville Blueprint projects. The sewershed for DSR 335 is approximately 1000 acres and includes approximately 3000 homes. To make the work more manageable, the city divided the area into smaller project areas, with area 2 divided into 2A and 2B. This Limited Environmental Review covers work associated with three of the six areas.

The BP Clintonville Part 1 bioretention project is located along Blenheim, Northridge , Chatham, Acton, Richards, Fallis, Arden, Granden, Glencoe roads and North High Street in Clintonville. The project is referred to as the Blenheim/Glencoe area project throughout this document

The BP Clintonville Part 2A biorentention project is located along Foster Street between Indian Springs Driveand Cooke Road, north of Cooke between Cooke Way and Henderson Road, the Alley (Project Alley 2) north of Cooke between Cooke and Henderson roads, Dominion Blvd. between Shields Place and Sellers Avenue, and the entirity of Dixon Court in Clintonville. Forty-two rain gardens are planned.

The BP Clintonville Part 4 bioretention project is located along Chatham, Northbridge, and Blenheim roads, Glenmont Avenue, and Wynding and Yaronia drives in Cllintonville. The project is referred to as the Overbrook/Chatham area project throughout this document.

Ohio EPA anticipates awarding WPCLF loans to the City of Columbus for the three BP Clintonville Green Infrastructure projects: Part 1, Part 2A, in April, 2017 and Part 4 in May, 2017. Construction of the projects will begin in the summer of 2017 and be completed by February, 2019.

The WPCLF program requires an environmental review as part of the loan award decision-making process. This Limited Environmental Review describes the three BP projects, and the potential for adverse environmental impacts during construction. Ohio EPA's environmental review has concluded that the proposed projects will not result in significant adverse environmental impacts. More detailed information follows in the sections below.

Figure 1: Blueprint Clintonville Green Infrastructure Part 1, 2A and 4 Projects Vicinity Map

Part 1 = ☆ Part 2A = ☆ Part 4 = ☆

Figure 2: Blenheim/Glencoe project area (Part 1)

Rain Garden

Figure 3 (A): Weisheimer/Indian Springs Bioretention (2A)

Rain Garden

Rain Garden/Bump Out

Pervious Pavers (Part 2)

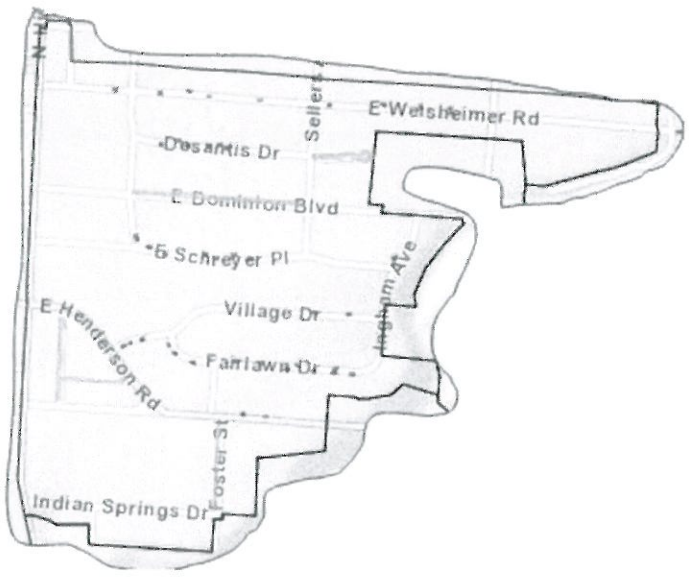
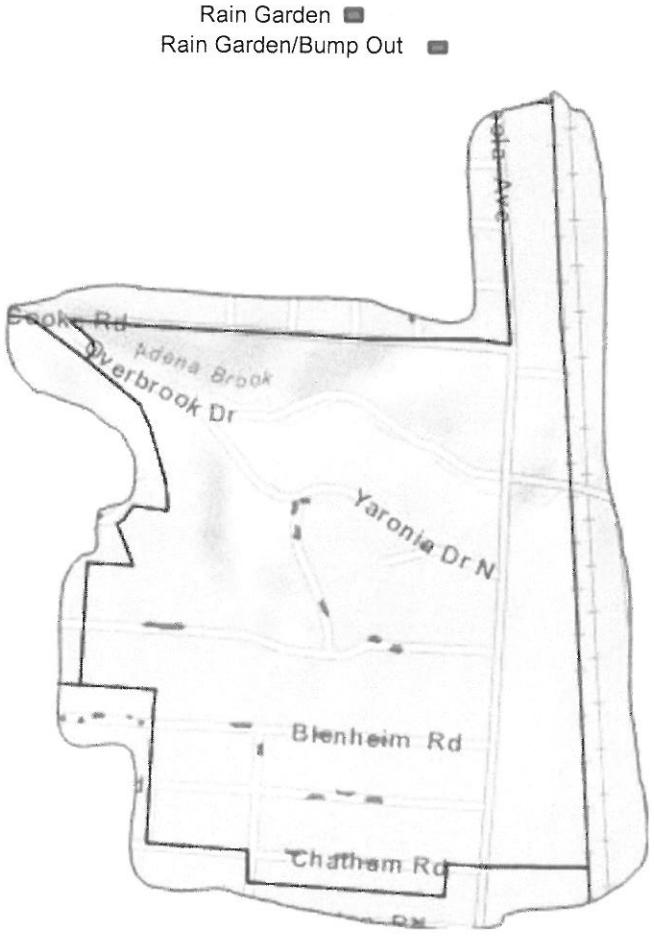


Figure 4: Overbrook/Chatham project area (Part 4)



2. Background and Existing Conditions

As stated above, the City is under orders from Ohio EPA to eliminate sanitary sewer overflows. Blueprint is intended to meet the requirements of those orders, which includes eliminating the overflow into Adena Brook in Whetstone Park (DSR 335). Homes in the Clintonville project areas are connected to a city sanitary sewer that contributes to those overflows.

The current Columbus population estimate is 811,943. The project areas are almost entirely built out and little additional sanitary flow is expected.

3. Discussion of Alternatives

As part of the City's Integrated Plan and the WWMP updated plan, the City investigated the best methods for eliminating the SSOs. Generally, two alternatives were developed: the Blueprint alternative and the "gray " alternative. The gray alternative includes storage basins, piping and tunnels. Both alternatives meet the requirements of the consent orders, and both have a positive impact on water quality.

The Blueprint plan has two primary water quality advantages: it achieves a greater reduction in overall overflows from the system and it has a positive impact on storm water quality due to extra filtering by vegetation and soils, which the gray alternative does not have. The gray alternative's only water quality benefit is from reducing sewer overflows. It does not have any impact on storm water discharge quality or volume.

Through an assessment of all the watershed assessment units (WAUs) in the Columbus Facility Planning Area (FPA), based on current Ohio, it was found that approximately 64 percent of the area within the Columbus FPA is impaired due to storm water factors. And since the Blueprint alternative includes a green infrastructure component, it will have a direct, significant and positive impact on water quality. The green infrastructure has been sized to ensure that the I/I removal does not increase localized flooding or the peak rate of discharge and to reduce total suspended solids (TSS).

4. Description of the Selected Alternative

The Blueprint Clintonville Green Infrastructure Part 1Blenheim/Glencoe project will construct rain gardens along Blenheim, Northridge, and Chatham roads from High Street to Colerain Avenue, Acton Road from High Street to Indianola Avenue, Richards Road from Sharon Avenue to Indianola Avenue, and Fallis, Arden, and Glencoe roads from High Street to Granden Road. Dimensions of green infrastructure are variable and described in their Storm water Strategic Plan, August, 2015. A large storm water wetland will also be constructed in Whetstone Park.

Blueprint Clintonville Green Infrastructure Part 2A Weisheimer/Indian Springs project will construct 42 rain gardens. See Figure 3 above.

Blueprint Clintonville Green Infrastructure Part 4 Overbrook/Chatham project will construct 21 rain gardens throughout the Overbrook-Chatham area. This will provide a nearly 21% reduction in TSS reaching Adena Brook from the 64 acres.

Green infrastructure will be installed on City property in neighborhoods, including the rights-of-way. Rain gardens will be constructed below street level, allowing rain water to

flow in and filter slowly to the sewers underneath.

The City of Columbus is responsible for maintaining all parts of the storm sewer system, including the new rain gardens and green infrastructure. Litter and weeds will be removed on a regular basis and plants will be pruned, trimmed or replaced, as needed.

The goal of both BP Clintonville projects is to provide detention and water quality improvement to rain water that will be redirected from the sanitary sewer system by future Blueprint projects.

5. Implementation Costs of the Proposed Project

The estimated construction cost for the Blueprint Clintonville Green Infrastructure Part 1Blenheim/Glencoe project is $6,500,000.

The estimated construction cost for the Blueprint Clintonville Green Infrastructure (Bioretention) Part 2A Weisheimer/Indian Springs project is $2,000,000.

The estimated construction cost for the Blueprint Clintonville Green Infrastructure Part 4 Overbrook/Chatham project is $1,000,000.

The City of Columbus has applied to the WPCLF for financing of the total cost of these projects, $9,500,000. Columbus qualifies for the standard below-market interest rate, which is adjusted monthly prior to loan award, and is currently 2.23 percent. The actual WPCLF loan amount to Columbus will be based on the as-bid costs of the project. Compared to the current market interest rate (3.48 percent, Columbus will save approximately $3,206,250 in interest payments through the WPCLF.

The City of Columbus passed an ordinance in October, 2014, authorizing an increase in sewer rates as of January, 2015. Inside the City, residential rates will increase approximately 2.89 percent. Outside the city, residential customer rates will increase 3 percent. The Department of Public Utilities will continue to offer the low income discount program that reduces qualifying participant's sewer commodity portion of their sewer bill by 20 percent.

In 2005, Columbus passed an ordinance to create a Clean River Fee to recover costs of construction for projects necessary to meet the requirements of its two consent orders that mandate elimination of wet-weather related combined sewer overflows and sanitary sewer overflows. This charge was assessed based on each property's measured impervious surface area. Since 2005, Columbus City Council has approved across-the-board rate increases, including the Clean River Fee, which allows the city to continue to address these consent order projects.

6. Proposed Project Schedule

Project 1

Advertise for Bids..... January 17, 2017
WPCLF Loan Award..... April, 2017
Start Construction..... August, 2017
Complete Construction.....February, 2019

Project 2A

Bids Opening..... March 1, 2017
WPCLF Loan Award..... April 27, 2017
Start Construction..... June/July, 2017
Complete Construction.....December, 2018

Project 4

Advertise for Bids..... December 20, 2016
WPCLF Loan Award.....April 27, 2017
Start Construction.....July, 2017
Complete Construction.....July, 2018

B. Environmental Impacts of the Proposed Project

A complete environmental review of the two Columbus Blueprint projects was conducted, which included the extensive alternatives analysis that has been conducted as part of the City of Columbus' Integrated Plan and 2015 WWMP Update Report to determine the most cost-effective, environmentally-sound solution to meet the needs of the planning area.

Construction mitigation has been included in the detailed plans and specifications for each of the Columbus Blueprint projects to help further prevent adverse environmental impacts. More detailed information regarding potential impacts follows.

1. Land Use

Existing land use within the project areas generally consists of residential neighborhoods. The proposed storm water green infrastructure will alter only the specific sites of each rain garden and the location of the proposed wetland in Whetstone Park.

2. Major Land Forms

The topography of Clintonville is divided into two regions. North High Street forms the demarcation line and the area east of North High street is higher in elevation than that

of the area west of High St. Six glacial ravines, Glen Echo, Walhalla, Overbrook, Beechwold, Delawanda and Bill Moose Run cut through the area from east to west, with stream beds feeding into the Olentangy River. Four of the ravines have been developed, either with public roadbeds and/or private residences. Glen Echo was the first ravine preserved as a public park. None of the proposed green infrastructure is in a ravine and the project will not alter the regional topography.

3. Local Economy

According to the 2009-2013 American Community Survey, the median household income (MHI) for Columbus is $44,774.

In anticipation of this and many other projects, Columbus issues bonds to generate the capital to proceed with construction. As such, the sewer service charges to Columbus customers are driven by the total expected indebtedness of the City's Division of Sewerage and Drainage, and expected overall operation and maintenance costs, as opposed to the specific indebtedness of this or any other individual project.

Currently, the average Columbus household (using approximately 7,480 gallons of water per month) is charged for wastewater treatment at a quarterly rate of $123. This rate includes the Clean River Surcharge of $9.66 per quarter. Annually, a typical Columbus household pays $492.

The 2009-2013 American Community Survey estimate for the City of Columbus median household income (MHI) was $44,072. Therefore, the average annual sewer service charge represents about 1.11% of the MHI for the Columbus area. This amount of household income spent on sewer service charges is slightly below the Ohio average of 1.36%. Based on this, no significant adverse impact to the local economy is expected from implementation of the three Columbus Blueprint Clintonville projects.

4. Air Quality

Franklin County is currently in attainment with respect to carbon monoxide, lead, nitrogen dioxide, particulate matter, and sulfur dioxide. The County is not in attainment of the ozone standards. During construction, standard construction best management practices (BMPs), such as dust suppressants and properly-operated equipment in good working order will be implemented. With these mitigation measures, any effects on air quality will be minor and temporary, ending when construction is complete. Therefore, no significant adverse impact to air quality will result from the project.

5. Archaeological and Historical Resources

The three Columbus Blueprint Clintonville projects were reviewed against the State Historic Preservation Office (SHPO) database. The proposed projects will be

implemented in areas that are predominantly residential developments and all work will be in previously disturbed areas. Ohio EPA has concluded that the proposed projects will have no effect on properties eligible for or listed on the National Register of Historic Places. The proposed rain gardens and other storm water infiltration features will be minor changes to the landscape and unlikely to adversely affect the setting of any nearby historic structures.

In the event of archaeological finds during construction, contractors and subcontractors are required under Ohio Revised Code Section 149.53 to notify the SHPO of any archaeological discoveries in the project area, and to cooperate with SHPO and Ohio EPA) in archaeological and historic surveys and salvage efforts when appropriate.

6. Drinking and Ground Water

All existing drinking water utilities will be identified in each project area and avoided in the design to. No private wells exist in the project area and ground water is not a public or private water source. Green Infrastructure shall be located a minimum of 10 feet horizontally from existing sanitary sewers to minimize potential infiltration and lateral flow into the sanitary sewer.

Therefore, construction of the three Columbus Blueprint projects should not have significant adverse long-term impacts on drinking water or ground water resources.

7. Floodplains, Surface Water Resources and Aquatic Habitat

Adena Brook flows westward between the Cooke/Glenmont Area project and the Schreyer/Springs Area project. Adena Brook has an aquatic life use designation of warmwater[1] habitat and flows into the Olentangy River. The Olentangy River also has an aquatic life use designation of warmwater habitat.

The green infrastructure component of Blueprint Columbus will first ensure that local flooding will not be made worse when the I/I removal technologies of Blueprint are applied at a later date. Secondly, a standard of at least 20 percent reduction of total suspended solids (TSS) will be applied.

The entire Clintonville area drains to the Olentangy River, and TSS is a pollutant of concern, according to the Ohio EPA's total maximum daily load (TMDL). The city calculated that the amount of green infrastructure it plans to install will reduce TSS loading from the pilot area by 22 percent.

[1] Warmwater habitat (WWH) – warmwater habitats are capable of supporting and maintaining a balanced, integrated, adaptive community of warmwater aquatic organisms.

8. Terrestrial Habitat

There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. With regards to the two federally-endangered/threatened species that could inhabit the area, the Indiana bat and northern long-eared bat, the USFWS recommends that trees exhibiting suitable bat habitat characteristics, along with any other wooded areas or tree lined corridors, be saved wherever possible. However, if those areas cannot be avoided, the USFWS recommends that trees should only be cut from October 1 through March 31. There will be a couple trees removed in the Blueprint area 1 (Blenheim Glencoe) project. The city agrees to the removal of these trees within the above timeframe. Due to the project type, size and location, the Ohio EPA does not anticipate potential adverse effects to any other federally endangered, threatened, proposed or candidate species.

9. Safety, Traffic, Noise and Aesthetics

The BP Clintonville projects are aligned within public rights-of-way along streets in Clintonville. Green Infrastructure will be located at a safe distance from traffic control features. In residential areas, street widths are typically narrower (22 to 26 feet) and include parking areas on both sides of the street. Placement of Green Infrastructure that will reduce overall street width will account for the minimum street width requirement of 22 feet from face of curb to face of curb as required by the City of Columbus Department of Public Service. Parking in the project areas was also considered. A minimum of one parking space per residential lot frontage will be maintained.

The sound of motorized construction vehicles operating near the construction site will be similar to that of traffic regularly transiting the project area and is not expected to be a significant impact

Noise and dust control procedures will comply with the Columbus City Code.

A detailed traffic control plan will be coordinated with the City's Division of Design and Construction. The plan will then be implemented during construction to manage traffic disruptions and prevent public safety problems. It will include temporary detours for lane closures caused by the project, it will allow for the provision of emergency access at all times and it will allow ingress and egress to all residential and commercial properties at all times. All stakeholders will be notified regarding the anticipated road closures and detours at least thirty days prior.

Although construction activity is generally considered aesthetically displeasing, green infrastructure is generally considered to be aesthetically pleasing. For this reason, the project is unlikely to negatively affect the aesthetics of the neighborhood.

C. Public Participation

The City of Columbus has made efforts throughout project development to keep the public and key stakeholders informed about of the project. This has been accomplished through many means:

- The city developed a video the explain Blueprint Columbus: www.columbus.gov/blueprint,
- Fliers, handouts and water bill inserts introduced residents to the plan and provided information,
- In-person surveys were administered to residents and business proprietors in the areas,
- Road shows were held at community events, festivals, libraries, and community and civic centers, and
- A community advisory panel was formed to represent a broad spectrum of stakeholders across Columbus. Members advised the City on the development of its plan to address both stormwater runoff and sewer overflows.

A notification letter will be sent and/or a door hanger will be placed alerting the property owner(s) to imminent construction activity.

The City of Columbus, Department of Public Utilities has an internet website (https://columbus.gov/publicutilities/), where the community can view information about this and upcoming projects.

Additionally, as part of the State Environmental Review Process, Ohio EPA will post this Limited Environmental Review and Finding of No Significant Impact (FONSI) to our web page located at: (www.epa.ohio.gov/defa/ofa.aspx under the tab "What's New." Scroll down to view WPCLF Documents for Review and Comment)

D. Conclusion

Ohio EPA conducts environmental reviews of all projects prior to approving WSRLA financing. Ohio EPA's State Environmental Review Process contains a special set of project review procedures for projects which do not have the potential to "individually, cumulatively over time, or in conjunction with other Federal, State, local, or private actions have a significant adverse effect on the quality of the human environment." Such projects qualify for a Limited Environmental Review. The projects meet the other qualifying criteria for a LER; specifically, the proposed projects:

- **will have no significant adverse environmental effect**, as sensitive resources such as floodplains, wetlands, riparian areas, prime or unique agricultural lands, aquifer recharge

zones, archaeological or historically significant sites, or threatened or endangered species are not present in the project areas;

- **do not require extensive specific impact mitigation** , as environmental impacts will be minor and temporary. Trees removed will be re-planted.
- **will have no adverse effect on high value environmental resources**, as the project areas are highly developed residential neighborhoods, with asphalt roads, manicured lawns and numerous existing utilities, so no high value environmental resources are present there;
- **are not controversial actions**, as water rates will not be increased as a result of these projects, nor will any adverse impacts to environmental resources occur. Further, Ohio EPA is unaware of any public opposition to the projects;
- **are cost-effective,** as green infrastructure is less expensive than gray infrastructure
- **do not create new, or relocate existing, discharges to surface or ground waters; and will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters,** since the proposed projects do not involve a point source discharge or the treatment of wastewater flows;
- **will not create new sources of water withdrawals from either surface or ground waters, or significantly increase the amount of water withdrawn from an existing source; nor will they provide capacity to serve a population substantially greater than the existing population.**

The planning activities for the project have identified no potentially significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources. Based upon Ohio EPA's review of the planning information and the materials presented in this Environmental Assessment, it is concluded that there will be no significant adverse impacts from the two BP Clintonville Green Infrastructure projects: 1, 2A and 4, as they relate to the environmental features discussed. Through the use of standard construction mitigation measures, any adverse impacts from construction should generally be short-term and insignificant.

The completion of the three BP Clintonville Green Infrastructure projects: 1, 2A, and 4 is an important investment in critical water pollution control infrastructure. The projects will install green infrastructure to ensure that when I/I removal technologies of Blueprint are also applied, they do not increase localized flooding or the peak rate of discharge and will also reduce TSS by at least 20 percent. These improvements are necessary to stop and mitigate WIB events and minimize sewage overflows to area streams in Columbus.

E. Questions or Comments

For further information or to provide comments regarding this document or the projects discussed herein, please contact:

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