



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

February 15, 2022

Limited Environmental Review and Finding of No Significant Impact

**City of Columbus – Franklin County
Blueprint Linden Artane/Parkwood Roof Re-Direct
Loan number: CS390274-0412**

The attached Limited Environmental Review (LER) is for a wastewater infrastructure 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 LER describes the project, its costs, and expected environmental benefits. Making available this LER 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. This project's relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment. More information can be obtained by calling or writing the person named at the end of the attached LER.

Upon issuance of this Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

Kathleen Courtright

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Blueprint Linden Artane/Parkwood Roof Re-Direct

Applicant: Columbus Department of Public Utilities
910 Dublin Road, 4th Floor
Columbus, Ohio 43215

Loan Number: CS390274-0412

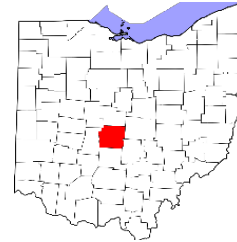


Figure 1. Franklin County

Project Summary

The City of Columbus, in Franklin County (Figure 1), is requesting a \$4,100,000 low-interest loan from the Ohio Water Pollution Control Loan Fund (WPCLF) to redirect roof laterals of homes within the North Linden Artane/Parkwood neighborhood to prevent excess storm water from entering the city's sanitary sewer system and protect basements from flooding.

History & Existing Conditions

In 2002 and 2004, the City of Columbus entered into two consent decrees with Ohio EPA to eliminate sewage backups into homes and overflows of untreated sewage into rivers during wet weather events. The city submitted its wet weather management plan (WWMP) to Ohio EPA in 2005 to outline how the city planned to meet the compliance criteria established within their consent decrees. The WWMP contained strategies to address the sewer overflows within their sanitary sewer and combined sewer systems. This plan consisted of building 28 miles of sewer tunnels and upsizing, lining, and replacing pipes. Due to the high cost of the proposed improvements, the city explored other alternatives. In 2013, with Ohio EPA approval, the Columbus Division of Sewerage and Drainage (DOSD) developed Blueprint Columbus as its integrated planning approach to study and incorporate green infrastructure (GI) into the WWMP. Green infrastructure is an approach to water management that mimics the natural water cycle and includes rain gardens, bioswales, permeable pavements, and bioretention areas.

Blueprint Columbus consists of 17 study areas, each roughly 1,000 acres in size. Every study area is broken into four to five project areas. Blueprint Linden is one of those 17 study areas and is comprised of four separate and distinct project areas (Hudson/McGuffey, Oakland Park/Medina, Agler/Berrell, and Artane/Parkwood).

Blueprint Linden's study area sanitary and storm water infrastructure is stressed during wet weather events. The challenges associated with the sanitary and storm sewer systems in the Linden area include the project area's eight designed sewer relief (DSR) points over 850 acres, approximately 660 documented water-in-basement (WIB) complaints, inadequate storm sewer conveyance capacity, and sanitary sewer deficiencies within the Linden area. Additionally, extraneous clear water entering sanitary sewers through illicit connections to storm sewers or via leaky manholes (inflow) or through cracks in pipes (infiltration) can overflow sewers and cause overflows.

The Artane/Parkwood area (see Figure 2) is in the southeast region of the Blueprint Linden area. The project area receives storm water from the west (Hudson/McGuffey) and conveys it to the north (Agler/Berrell) and to the south (out of the Blueprint Linden area).

The sanitary sewershed area of the Artane/Parkwood area is approximately 154 acres and consists of 618 addresses. It is primarily residential, with commercial and multi-family residential buildings along Cleveland Avenue and East Hudson Street.

Investigations show that flow from roof drains is entering sanitary laterals either through direct connection to the sanitary lateral or indirectly through the four-inch to six-inch transition from the house plumbing to the sanitary lateral. Downspouts of many of the homes in the project area are connected to the foundation drain; therefore, the amount of flow in the foundation drain can be significant.

Many houses have existing downspout drain tiles that convey flow from one or more downspouts and discharge to the street, to a storm sewer, or to ground away from the house. Older drain tiles often have cracks, broken pipes, or open joints that allow root intrusion or are partially/fully blocked from collapse or deposition. These issues can restrict the drain tiles' ability to convey flow away from downspouts therefore backing water up around house foundations.

Project Description

The intent of this project is to redirect roof drainage on approximately 324 homes away from the foundations and away from the sanitary laterals by installing downspout drain tiles where none currently exist or replacing existing deteriorated downspout drain tiles. It is estimated that five acres of roof area will be redirected from around foundations out to the street.

Any downspout not currently directing roof runoff a minimum of seven feet away from the foundation of the structure will be identified for potential redirection. Where possible, storm water will be redirected through three-inch conduit to the road right of-way, but where this is not feasible, storm water will be directed seven feet away from foundations. Obstacles such as trees, driveways, and A/C units may prohibit redirecting all downspouts away from foundations so the target is to redirect at least 50% of the downspouts.

The only earthwork anticipated is the excavation associated with installation of the three-inch conduit in residential lawns. Steel plates or plywood will be used to minimize land disturbance.

Implementation

The City of Columbus is requesting a \$4,100,000 low-interest loan from the WPCLF. Columbus qualifies for the standard low-interest loan rate of 0.58% (interest rates are set monthly and may change for the requested March loan award). This will save the city \$566,156 for a 20-year loan compared to the market rate, which is currently at 1.83%.

The median household income (MHI) of Columbus is \$51,612. The projected average annual residential sewer bill is \$713/year which is 1.3% of the MHI. This compares favorably to the Ohio average annual residential sewer bill, \$749, which is 1.4% of the state MHI.

Project initiation is expected in May 2022 and the project will be completed by May 2023.

Public Participation

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

- Specific to this project, public meetings, mailers, and website descriptions have been provided to the residents describing the lateral rehabilitation process.
- 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.
- The city developed a video explaining Blueprint Columbus: www.columbus.gov/blueprint.
- 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 storm water runoff and sewer overflows.
- Information about this specific project is on the city's webpage at: <https://www.columbus.gov/Templates/Detail.aspx?id=2147494011>

Outreach to homeowners is the responsibility of the contractor. Private property owners will be notified by mailings and door hangers prior to property inspections and at least one week prior to construction. Resident requests for modification will be considered.

As part of its State Environmental Review Process, Ohio EPA's Division of Environmental and Financial Assistance (DEFA) will post this Limited Environmental Review (LER) and Finding of No Significant Impact to its web page located at: <https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>.

Conclusion

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater collection system which involves improvements to storm water infrastructure. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect, will require no specific impact mitigation, and will have no effect on high-value environmental resources because work will be in previously disturbed areas in road rights-of-way and in residential lawns that have been previously disturbed. No valuable environmental features are present. The contractor will avoid impacts to trees.

Is cost effective because the project will reduce costs associated with basement backups.

Is not a controversial action because the city is addressing a problem that results in residential basement sewer backups.

Does not create a new or relocate an existing discharge 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 because this project minimizes storm water entry into the sanitary sewer system by disconnecting downspouts that are connected to sanitary sewer lines, as well as minimizing basement back-ups and combined sewer overflows, and does not otherwise alter the city's sanitary sewage collection, treatment system, or discharges.

Will not provide capacity to serve a population substantially greater than the existing population because this project addresses existing storm water issues in a developed area.

Contact information

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Figure 2. Location of Artane and Parkwood areas within Linden neighborhood