



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

June 23, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Columbus – Franklin County
Blueprint Linden RR – Agler/Berrell
Loan number: CS390274-0431**

The attached Limited Environmental Review (LER) is for a stormwater management 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,

Jonathan Bernstein for

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Blueprint Linden RR - Agler/Berrell

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

Loan Number: CS390274-0431



Figure 1. Franklin County

Project Summary

The City of Columbus in Franklin County (Figure 1) is requesting a \$3,000,000 low-interest loan from the Water Pollution Control Loan Fund (WPCLF) to re-direct roof laterals away from homes in the North Linden neighborhood to prevent excess stormwater from entering the city's sanitary sewer system.

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 U.S. EPA consent decree. The WWMP contained strategies to address the sewer overflows within their sanitary sewer and combined sewer systems. This plan consisted of gray solutions only, including building 28 miles of sewer tunnels and upsizing, lining, and replacing pipes, among others. Due to the high cost of gray improvements, the city explored other alternatives. In 2012, 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) technologies into the WWMP.

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 (Figure 2).

The Agler/Berrell project area is 212 acres generally bounded by Agler Road on the north, Genessee Avenue on the south, Cleveland Avenue on the west, and Berrell Avenue on the east. The residential parcel count is 610 with 536 single-family residential structures.

There were 2,559 downspouts identified in the project area. The downspouts from approximately 22% of the residential houses are currently directed to the street or storm sewer while the remaining 78% are discharging to the lawn or buffer zone around house. The water staying in the lawn or buffer zone has the potential to enter into the sanitary sewers via inflow and infiltration (I/I). Additionally, some homes in the area were built with downspouts connecting directly entering the sanitary sewer (see Figure 3).

Project Description

To reduce the amount of stormwater entering the sanitary sewer and impacting Alum Creek, this project will involve redirecting roof drainage on approximately 335 out of 544 homes in the project area away from home foundations and away from the sanitary lateral by installing downspout drain tiles where none currently exist, replacing existing downspout drain tiles that are damaged, and disconnecting downspouts that are directly tied to the sanitary sewer. The goal of this project is to direct water away from houses out to the streets and into a storm sewer catch basin/bioswale or rain gardens to minimize the amount of stormwater getting into the sanitary sewer system.

Implementation

The City of Columbus is requesting a \$3,000,000 low-interest loan from the WPCLF. Columbus qualifies for the standard interest rate of 2.61%, which will save the city \$463,104 for a 20-year loan compared to the market rate, which is currently at 3.86%. Interest rates are set monthly and may change for a later loan award.

In 2005, Columbus passed an ordinance to create a stormwater Clean River Fee to recover costs of construction for projects necessary to meet the consent order requirements 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. The stormwater fee is \$4.20 per month or \$54 per year.

The project is projected to begin in June 2023 and be completed by May 2024.

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:

- Fliers, handouts, and 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.
- 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 stormwater runoff and sewer overflows.
- Information about this specific project is on the city's webpage at: <https://www.columbus.gov/search.aspx?q=Roof%20Redirect>

Public meetings were conducted in the project area that included information about this project. In addition, the project team will place door hangers one to two weeks prior to start of construction.

Ohio EPA is not aware of any significant public concern about this project. Columbus has worked well with residents to address any preliminary concerns.

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/divisions-and-offices/environmental-financial-assistance/announcements>.

Based on the limited environmental and economic impacts, this is considered an appropriate level of public participation.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater collection system which involves improvements to stormwater 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 areas that have been previously disturbed.

Is cost effective because the city considered many alternatives and stormwater management via roof re-directs is a feasible solution.

Is not a controversial action because the project will not raise sewer rates, the city ensured coordination with residents, and the project will help reduce stormwater backup in the neighborhood.

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 does not include a new discharge point but will manage an existing stormwater problem.

Will not provide capacity to serve a population substantially greater than the existing population because this project deals with existing stormwater issues.

Contact information

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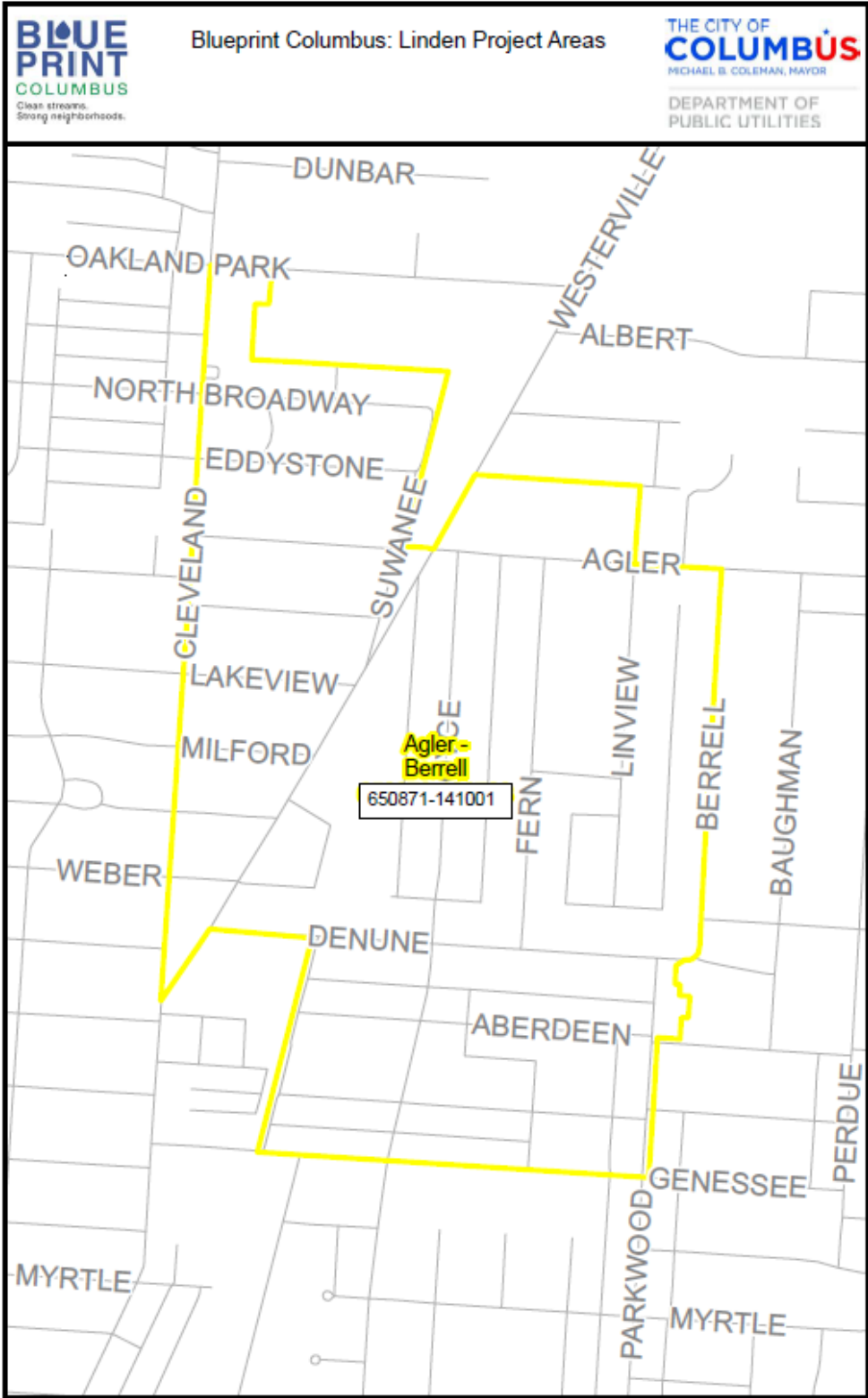


Figure 2. Agler/Berrell Project Area

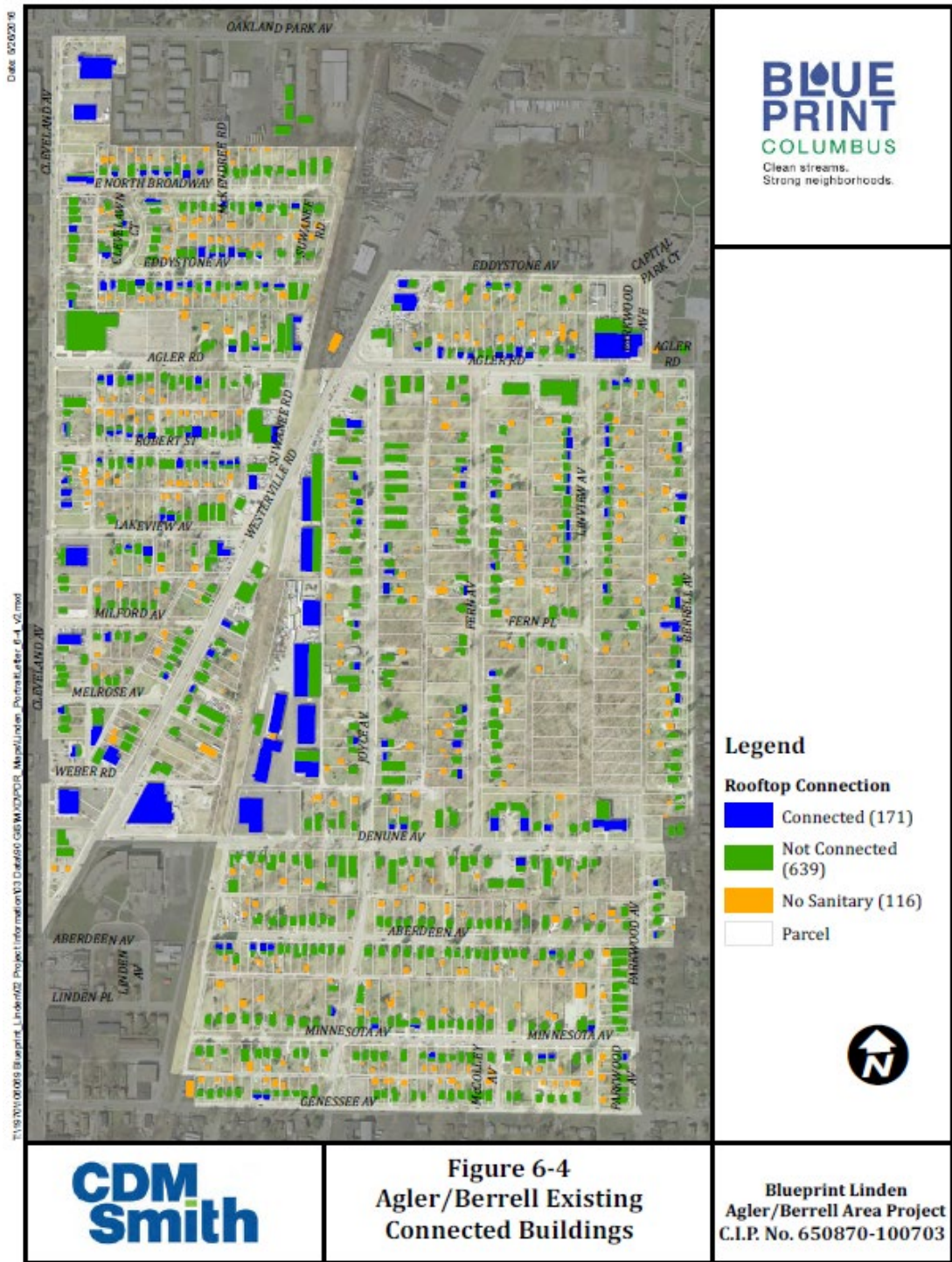


Figure 3. Location of roof drains connected to sanitary sewer and those not connected