



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

April 6, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Columbus – Franklin County
Blueprint Hilltop GI Palmetto/Westgate
Loan number: CS390274-0274**

The attached Limited Environmental Review (LER) is for a green 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, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Blueprint Hilltop GI Palmetto/Westgate

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

Loan Number: CS390274-0274



Figure 1. Franklin County

Project Summary

The City of Columbus, in Franklin County (Figure 1), is requesting a \$4,800,000 low-interest loan from the Ohio Water Pollution Control Loan Fund (WPCLF) to construct green infrastructure as part of an integrated plan to address combined sewer overflows and water-in-basement problems. This project qualifies for a Green Project Reserve discount of 0.25%.

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 address sewer overflows and water-in-basement (WIB) occurrences. The four pillars of Blueprint are sewer lining, roof drain redirection, sump pump installations, and green infrastructure.

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. The Palmetto/Westgate project area is the western portion of the Blueprint Hilltop 1 project area and is bordered to the north by West Broad Street, to the east by Hague Avenue, to the south by Sullivant Avenue, and to the west by Derrer Road (Figure 2). The area is primarily residential with some commercial properties along the northern and southern boundaries of the project area, as well as 49 acres of publicly owned property such as schools and churches that are non-developable. The area also contains a large 46-acre park, Westgate Park, located in the southwest corner of the project area. Stormwater exits the Palmetto/Westgate area at five main storm outfalls. Stormwater management is needed in this area to minimize flows being sent to the area wastewater treatment plant.

Project Description

To better manage storm water and minimize its impacts on the sanitary sewer system, Columbus will install 13 regional basins, four shallow basins located in the right-of-way (ROW), 19 walled basins located in the ROW, and approximately 188,487 square feet of street-width permeable interlocking pavers. See figures 3 and 4 for project details.

Implementation

The City of Columbus is requesting a \$4.8 million low-interest loan from the WPCLF for this project. Columbus qualifies for a standard 2.49% loan rate. This project is eligible for an additional Green Reserve discount of 0.25%, which brings their loan rate to 2.24%. This will save the city approximately \$878,000 over a 20-year loan compared to the market rate, which is currently at 3.74%. Interest rates are set monthly and may change for the requested loan award date.

The median household income (MHI) of Columbus is \$44,774. The projected 2024 average yearly residential user rate is \$777, which is 1.7% of the MHI and is slightly higher than the statewide average of 1.3%. The Department of Public Utilities continues to offer a low-income discount program that reduces qualifying participant's sewer commodity portion of their sewer bill by 20%.

The project will take approximately 18 months to be completed once it begins after loan award.

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 the following methods:

- 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.
- 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/Templates/Detail.aspx?id=2147494011>.

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>.

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 green infrastructure practices are an effective and less expensive way to address stormwater than gray infrastructure.

Is not a controversial action because the city is addressing a stormwater problem while working closely with the residents to make sure they are satisfied with the design of the project.

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 and does not otherwise alter the city's sanitary sewage collection or treatment system. The project will help minimize storm water discharge by increasing storm water infiltration.

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

Contact information

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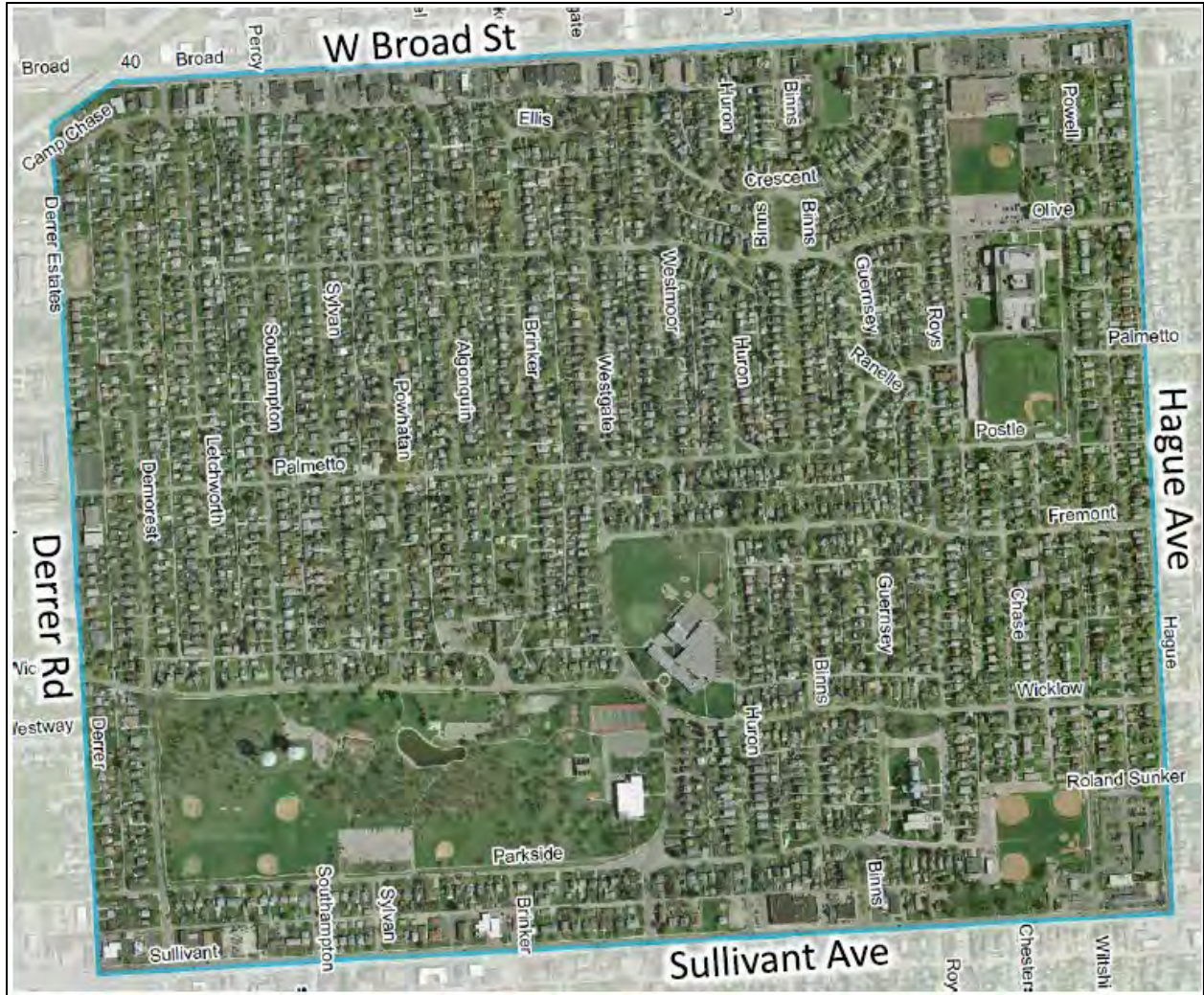


Figure 2. Project area

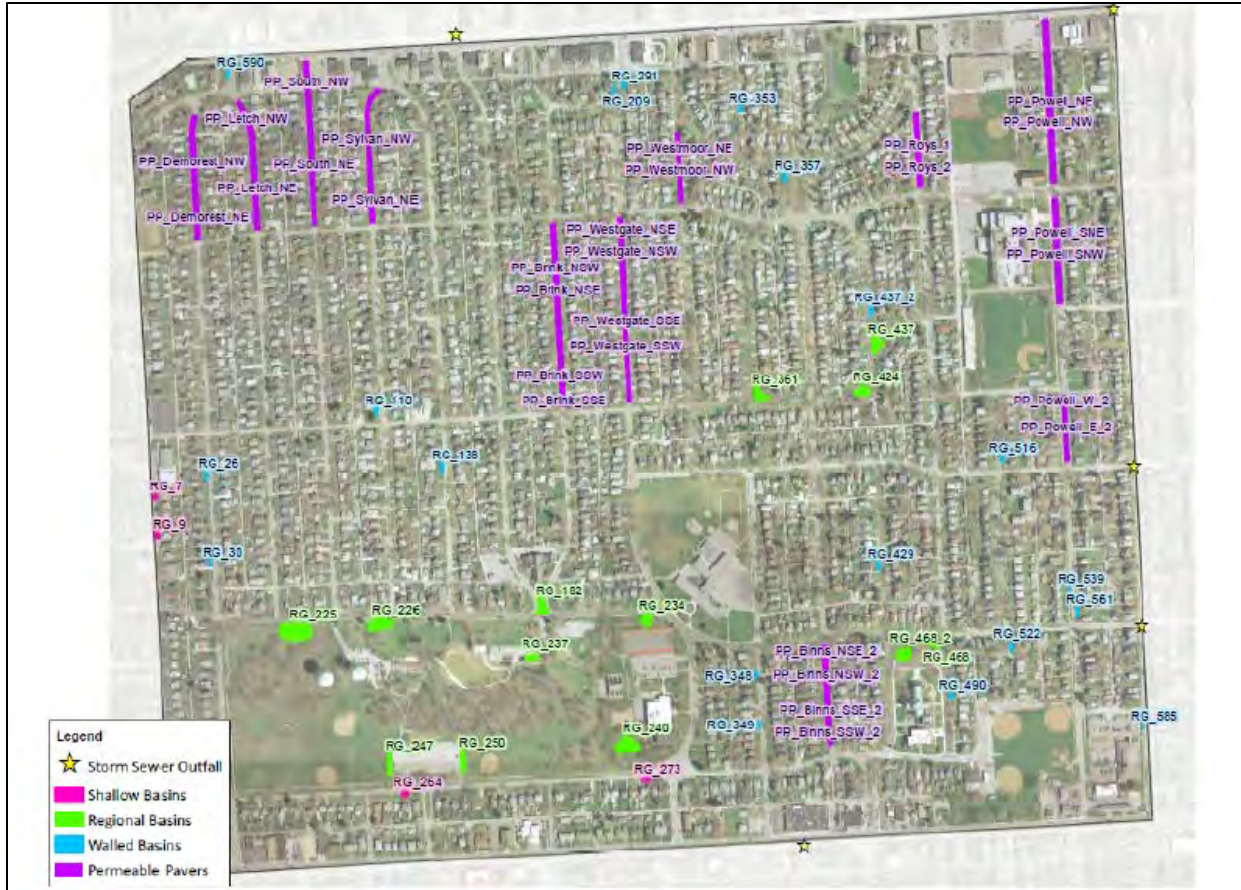


Figure 3. Location of proposed shallow basins, regional basins, walled basins, and permeable pavers



Figure 4. Detail of the proposed alternative