March 2, 2026

Limited Environmental Review and Finding of No Significant Impact

City of Columbus – Franklin County
Blueprint Hilltop Green Infrastructure – Highland/Harris
Loan number: CS390274-0429

The attached Limited Environmental Review (LER) is for a stormwater management project in Columbus which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, costs, and expected environmental benefits. Making available this LER fulfills the 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 program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. In accordance with Ohio Administrative Code 3745-150-05, this project meets the criteria for an LER rather than the more comprehensive Environmental Assessment. More information can be obtained by contacting the person named at the end of the attached LER.

Upon issuance of this Final 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
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LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Blueprint Hilltop – Green Infrastructure Highland/Harris

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

Loan Number: CS390274-0429

Figure 1. Franklin County

Project Summary

The City of Columbus in Franklin County (Figure 1) has requested funding from the Ohio Water Pollution Control Loan Fund (WPCLF) for construction of green infrastructure to capture stormwater and prevent flooding in the Hilltop Highland/Harris neighborhood. As the project involves construction within roadways or rights-of-way that have been previously disturbed, environmental impacts are expected to be limited.

History & Existing Conditions

The City of Columbus owns, operates, and maintains a complex sewer system that includes both separated and combined sewers. Wastewater is treated at one of the city's interconnected treatment plants, either the Jackson Pike Wastewater Treatment Plant (JPWWTP) or the Southerly Wastewater Treatment Plant (SWWTP). After treatment, effluent is released to the Scioto River.

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 its consent decrees. The WWMP contained strategies to address sewer overflows including expansion of wastewater treatment plants, construction of additional sewer tunnels and relief pipes, and upsizing, lining, and rehabilitating existing 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 incorporate stormwater and green infrastructure into the WWMP. The four pillars of the Blueprint Columbus program as outlined in the September 2015 Integrated Plan and 2015 WWMP Update Report are sewer lining, roof drain redirection, sump pump installations, and green infrastructure. Implementation of these four pillars will reduce inflow and

infiltration (I&I) in the city's sanitary sewer systems and minimize sewer overflows and water-in-basement (WIB) occurrences throughout Columbus. Surveys conducted by the city determined that over 50% of the I&I of stormwater into the collection system can be traced to private sources, mostly in residential neighborhoods. Therefore, Blueprint Columbus seeks to address the root cause of overflows instead of constructing infrastructure to cater to these excess flows.

Green infrastructure is one component of a larger package of projects that will upgrade the collection system to reduce sewer overflows and WIB occurrences.

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 Hilltop is one of those 17 study areas, with Highland/Harris as the project area.

Project Description

The Highland/Harris project area is the southeastern part of the greater Hilltop area. Much of the area is residential, with some commercial properties along Sullivant Avenue, and institutional properties such as schools and churches dispersed throughout.

This green infrastructure project will construct 75 residential rain gardens with one curb bump-out and seven regional bioretention basins on land bank-owned properties with a total combined bioretention area of 24,863 square feet. Bioretention basins are shallow depressions filled with sandy soil, topped with a thick layer of mulch, and planted with dense vegetation. They collect stormwater runoff and allow it to absorb into the ground at a slower rate, reducing peak runoff volumes. Specialized native plants uptake nutrients and filter suspended sediments. Bioretention areas are usually designed to allow ponded water with an overflow outlet to prevent flooding during large storm events.

While biorientation basins are larger scale, rain gardens are often smaller and found in residential areas. Rain garden sites are excavated and the subsurface is prepared by adding layers of stone and soil designed to filter stormwater. Plants and mulch make up the top layer of a rain garden. Rain gardens act as a basin to capture and absorb water runoff. Nutrients, oils, and other pollutants are then filtered by the soil and plants.

This project will also reconstruct 26,374 square feet of street on South Richardson Avenue and North Eureka Avenue with permeable pavers. Permeable pavers are brick-looking concrete blocks designed so that rainwater seeps between them instead of running across the surface. Pollutants carried by rainwater runoff are filtered out by layers of gravel beneath the surface, and the stormwater slowly releases into the underground drain that connects to the storm sewer. This system of stormwater management is able to slow and clean water before it enters rivers and streams, improving water quality. This project will also help prevent flooding within the area as well as reduce sewage backups into basements or onto streets and properties.
Available area within previously disturbed rights-of-way was primarily targeted for green infrastructure siting, thereby minimizing effects on environmental resources. The contractor is

responsible for best management practices to control dust, erosion, and sedimentation, and maintain local traffic during construction.

See Figure 2 below for project location.

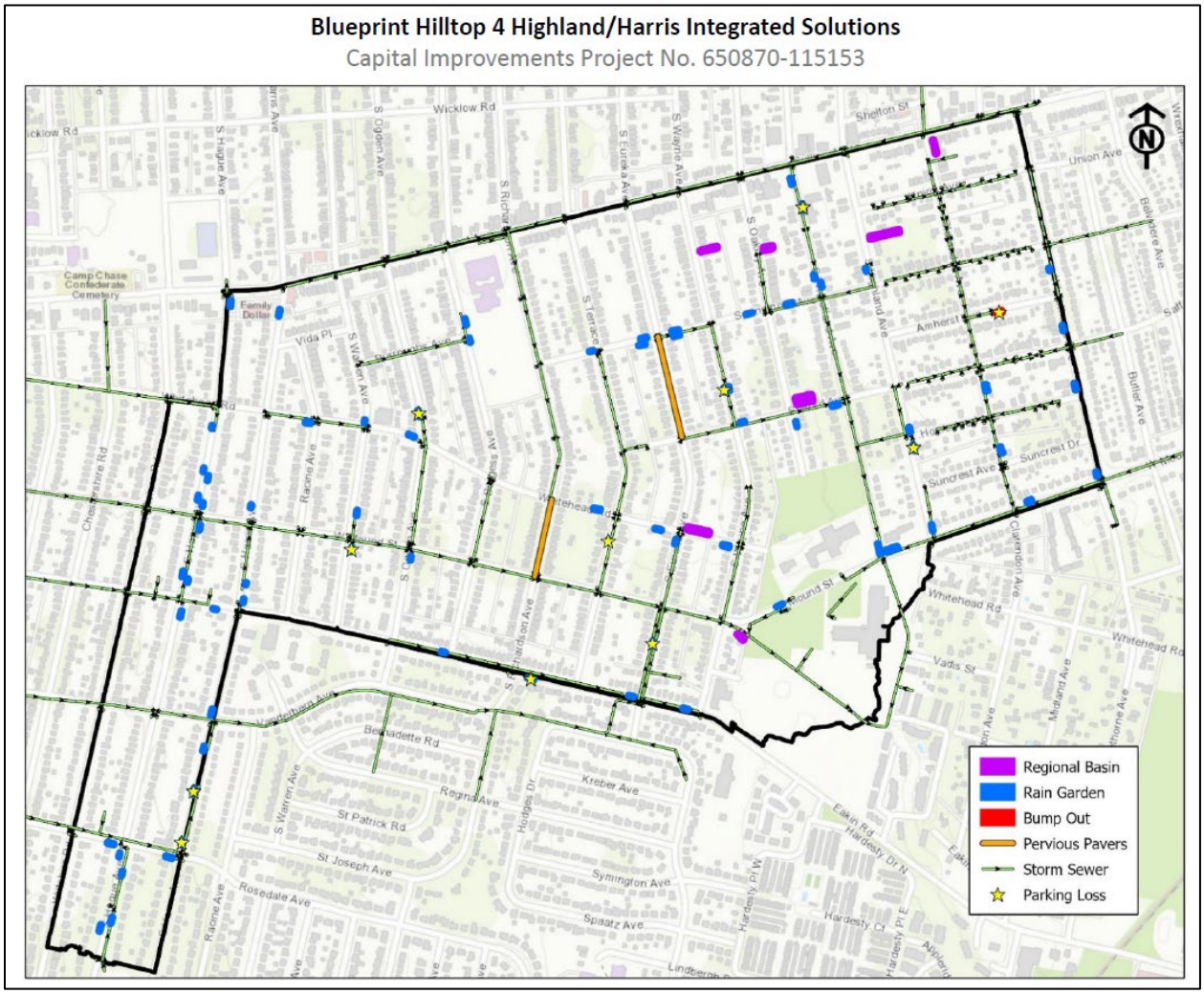

Figure 2. Project location

Implementation

Columbus will receive approximately $13 million from the WPCLF over a 20-year loan period at the standard rate of 3.18%. Interest rates are set monthly and may change for a different loan award date. This project is also eligible for the Green Project Reserve (GPR) category, as green infrastructure costs comprise more than 25% of the total project cost. Project that meet this criteria are eligible to receive an additional 0.25% discount on their awarded loan's interest rate. By using WPCLF financing for this project, Columbus could save over $2 million over the life of the loan compared to the current market rate of 4.43%.

The current average annual Columbus residential sewer bill is $769. Residential bills with the implementation of this and other associated wastewater projects are expected to increase to approximately $1,016, or 1.6% of median household income (MHI) of Columbus, which is $65,327.

By using WPCLF financing for these projects, Columbus has minimized the economic impact on customers.

The anticipated loan award will occur in March 2026, and construction is expected to be completed by October 2027.

Public Participation

The City of Columbus has created a website for Blueprint Columbus to present information about the program, its initiatives, and provide a place for neighborhood updates and answers to frequently asked questions. Multiple public meetings regarding Blueprint have been held over the past few years where green infrastructure has been discussed. Residents affected by this project received letters introducing them to Blueprint and its purpose. Door-hangers were distributed prior to field personnel conducting investigations for stormwater solutions in the neighborhood.

Ohio EPA is unaware of any controversy about or opposition to this project. The Limited Environmental Review (LER) and Finding of No Significant Impact (FNSI) will be posted on the Ohio EPA Division of Environmental and Financial Assistance website. Additionally, the LER and FNSI will be provided to the City of Columbus to be made available according to their public notification procedures.

Conclusion

The proposed project meets the criteria for an LER; namely, it is an action to improve stormwater infrastructure. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect, will have no effect on high-value environmental resources, and does not require extensive specific impact mitigation.
Construction will take place in previously disturbed roadways and rights-of-way, which lack important environmental features. No stream crossings or in-wetland work are scheduled to occur, and there will be no construction within prime farmland or within the floodplain. If necessary, tree clearing is to occur within seasonal clearing dates to protect endangered bat species located in the area. The contractor is responsible for dust control, sedimentation and erosion control, and maintenance of traffic during construction.

Is cost effective.
Green infrastructure practices are an effective and less expensive way to address stormwater issues. Taking no action would continue to allow costly stormwater issues such as flooding and water-in-basement occurrences.

Is not controversial.
Ohio EPA is unaware of any specific opposition to or controversy about these projects from affected residents.

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.
This project involves construction of green infrastructure to capture and treat stormwater and will not create a new or increase treated wastewater discharges. There will be no change in pollutant loading. Instead, the project will reduce pollutants received by local streams.

Will not provide capacity to serve a population substantially greater than the existing population.
This project is intended to improve infrastructure for the existing population.

Based upon Ohio EPA's review of the planning information and the materials presented in this LER, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to environmental features. 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.

This project will continue Columbus' efforts to reduce sewage backups and improve the quality of water draining to Columbus' rivers and streams.

Contact Information

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