



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

**February 3, 2023**

**Limited Environmental Review and Finding of No Significant Impact**

**City of Columbus – Franklin County  
Blueprint North Linden Roof Re-Direct - Oakland Park/Medina Area  
Loan number: CS390274-0432**

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,

Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Project: Blueprint North Linden Roof Re-Direct - Oakland Park/Medina Area

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

Loan Number: CS390274-0432

### **Project Summary**

The City of Columbus in Franklin County is requesting a \$3,703,000 low-interest loan from the Ohio Water Pollution Control Loan Fund (WPCLF) to re-direct roof laterals away from homes in the North Linden Oakland Park/Medina 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 consent decrees. The WWMP contained strategies to address the sewer overflows within their sanitary sewer and combined sewer systems (Figure 2). 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 21 project areas (Figure 1). There are four separate and distinct neighborhood 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 majority of the city's utility investment in Linden occurred during the 1920s and 1930s. Therefore, the infrastructure is experiencing degradation due to age.

Investigations show that flow from roof drains is entering sanitary laterals either through direct connection to the sanitary lateral or indirectly through the 4-inch to 6-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 pipe, 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 goal of this project is to reduce the amount of inflow and infiltration entering the city's sanitary sewer system via roof drainage.

To reduce the amount of stormwater entering the sanitary sewer, this project will involve redirecting roof drainage on approximately 255 to 350 homes in the project area away from home foundations and away from the sanitary lateral by installing downspout drain tiles where none currently exist or replacing existing downspout drain tiles.

### **Implementation**

The City of Columbus is requesting a \$3,703,000 loan from the WPCLF. Columbus qualifies for the standard low-interest loan rate of 3.01% which will save the city \$472,402 for a 20-year loan compared to the market rate, which is currently 4.26%. Interest rates are set monthly and may change for a later loan award.

The median household income (MHI) of Columbus is \$44,774. The projected average monthly residential sanitary rate is \$64.78 or \$777/year which is slightly more than the state average annual sewer rate of \$729.

The project will begin after loan award and be completed by March 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:

- The city developed a video explaining Blueprint Columbus, found at the following website: [www.columbus.gov/blueprint](http://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 and door hangers will be hung 48-72 hours prior to any work being performed on private property.
- 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.

Information about this specific project is on the city's webpage at: <https://www.columbus.gov/search.aspx?q=Roof%20Redirect>. Project initiation/description packets will be hand-delivered to all properties in the project area, prior to beginning the work.

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>.

### **Conclusion**

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public stormwater management system, which involves the functional replacement of and improvements to existing infrastructure. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

**Will have no significant environmental effect and will require no specific impact mitigation. Will have no effect on high-value environmental resources** because work will be in previously disturbed residential areas and road rights-of-way.

**Is cost effective** because this is an inexpensive way to manage stormwater verses constructing gray infrastructure which is exceedingly expensive.

**Is not a controversial action** because the project will protect private property. Additionally, the city is addressing a stormwater problem as required by a consent decree.

**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.

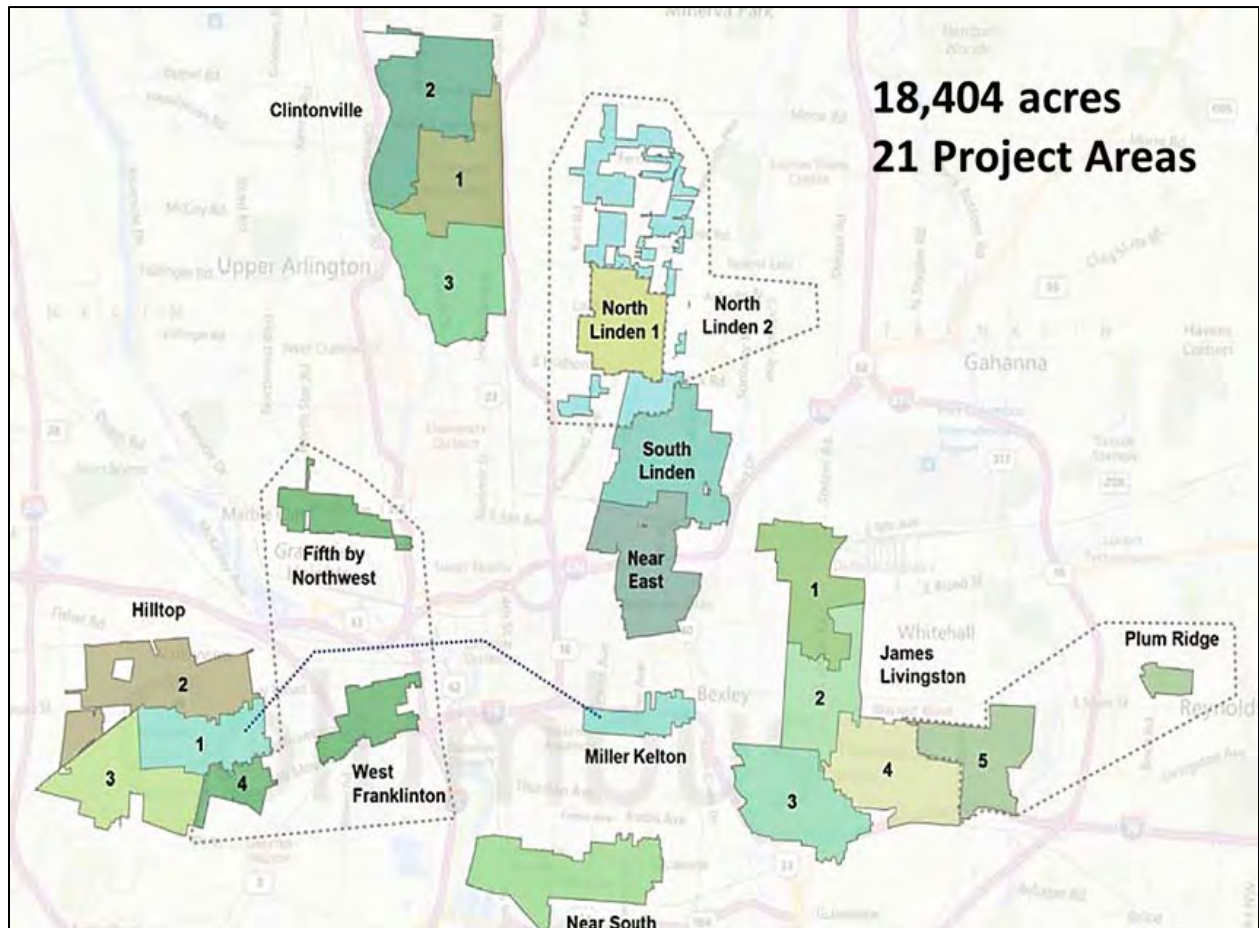
Based upon Ohio EPA's review of the planning information and the materials presented in this Limited Environmental Review, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to the environmental features discussed previously. This is because these 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 result in reduced residential flooding and will protect Alum Creek from combined sewer overflows.

**Contact information**

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**Figure 1. Blueprint project areas**

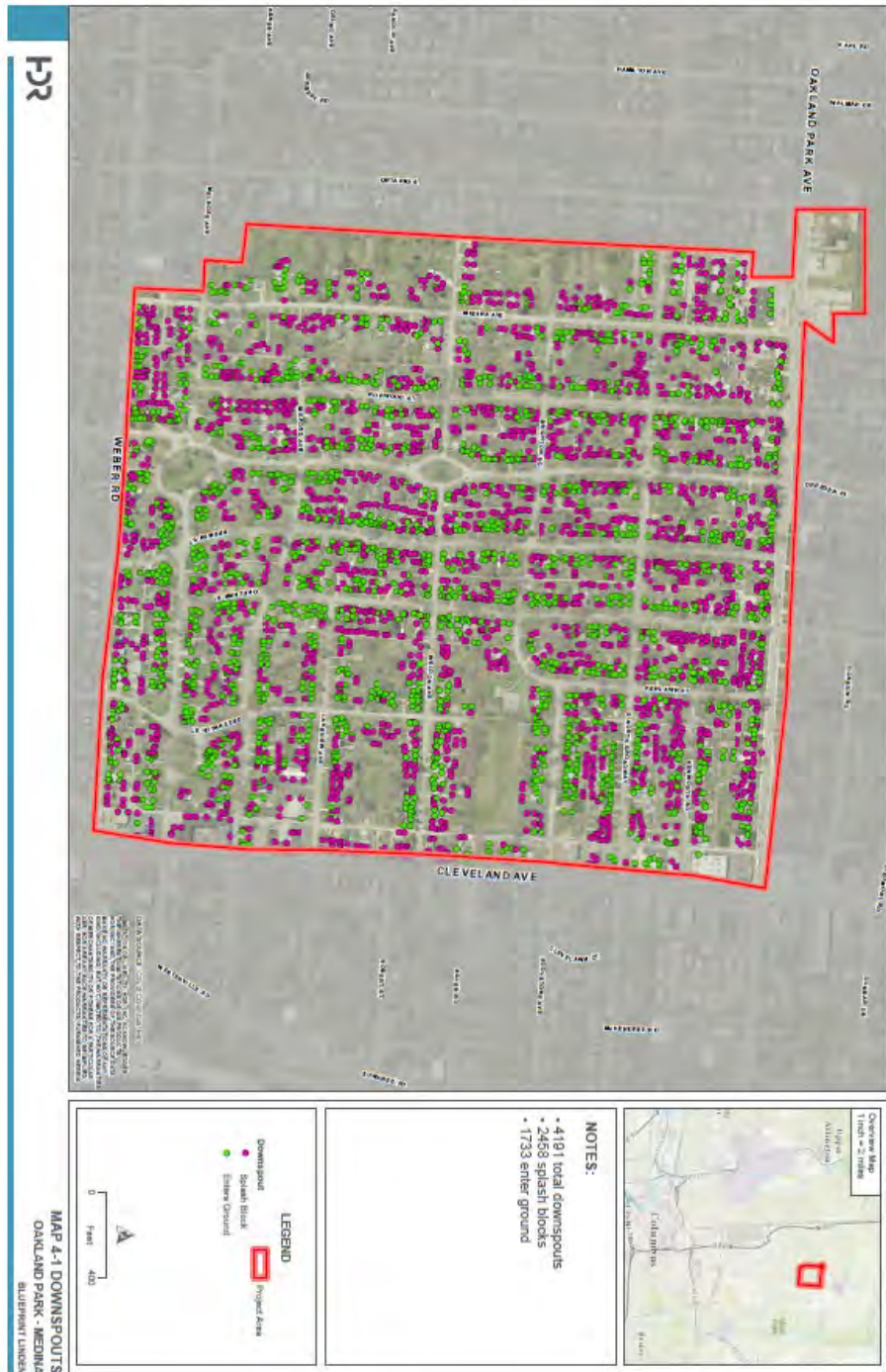


Figure 2. Location of downspouts. Those in green enter the ground and those in purple are where downspouts exit at the surface.