



October 23, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Columbus – Franklin County
Blueprint Fifth by Northwest (GI)- Sunrise/Glenn
Loan number: CS390274-0428**

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,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: City of Columbus Blueprint Fifth by Northwest (GI) - Sunrise/Glenn

Applicant: City of Columbus
910 Dublin Road - 4th Floor
Columbus, Ohio 43215

Loan Number: CS390274-0428

Project Summary

The City of Columbus in Franklin County is requesting a \$10,000,000 low-interest loan from the Water Pollution Control Loan Fund (WPCLF) to construct green infrastructure (GI) practices to capture and treat stormwater in the Fifth by Northwest - Sunrise/Glen area.

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 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 Sunrise/Glenn project area is located in the west half of the Fifth by Northwest study area, with the Edgehill/Meadow project area making up the downstream and east half (figures 1 and 2). The Sunrise/Glenn area is primarily single and multi-family residential, with commercial properties lining the major arterials, especially on Fifth Avenue. The study area was initially developed in the early to middle part of the 20th century and as such the stormwater infrastructure is not as robust by today's stormwater drainage standards. There are five primary outfalls from the Sunrise-Glenn study area: Third, Thornwood, Fifth, Sixth, and King avenues.

Numerous WIBs have been reported in the Fifth by Northwest area with 90 specifically coming from Sunrise/Glenn neighborhood (Figure 3).

Project Description

A number of alternatives were considered to determine whether they would meet the required total suspended solids removal (TSS) in stormwater, as well as other factors such as cost effectiveness and location in the city-owned road rights-of-way. Initially 171 green infrastructure locations were identified, later reduced to 102 and then to the selected alternative of 83 rain gardens.

The city's proposal is to construct 83 rain gardens in the public rights-of-way to capture stormwater runoff and provide treatment for the removal of pollutants within the project boundary. These bioretention facilities will facilitate infiltration of the captured stormwater directly into the soil, thereby reducing the total amount of suspended solids and pollutants being transported to the Olentangy river. This project comes before the planned roof lateral re-direct so that the extra stormwater can be managed by the new bioretention basins. See Figure 4 for locations of rain gardens.

Implementation

The City of Columbus is requesting \$10,000,000 from the WPCLF. This project qualifies for a 0.25% green reserve discount off the standard interest rate of 2.88% for a 2.63 % interest rate on a 20-year loan. This will save the city approximately \$1.87 million over the life of the loan compared to the market rate of 4.13%. Interest rates are set monthly and may change for the requested loan award date.

The median household income (MHI) of Columbus is \$54,902. The Columbus average annual sewer bill in 2024 will be \$819, which is 1.5 % of the MHI. This fee will help pay for this project.

The current construction schedule is to begin work after loan award and will be complete within 620 days.

Public Participation

The city held public meetings with residents who will have rain gardens in front of their houses to communicate the temporary construction conditions and the permanent improvements being proposed. The city incorporated resident feedback into the design.

The city also had "lessons learned" meetings with the design professionals to relay resident feedback from previous Blueprint project areas in order to minimize neighborhood impacts and enhance the esthetic of the rain gardens, including reducing impacts to on-street parking, reduction of the visibility of hardscape features, and adding winter interest plants. The city is also working with residents to select their preferred plants for rain gardens in the vicinity of their property.

All GI locations (rain gardens and pervious pavement) were spray painted and a Blueprint yard sign with contact information was installed at GI locations.

There were three presentations to the Fifth by Northwest Area Commission about this project during the design period. Information is also available on the Blueprint neighborhoods website.

The city will also hold construction kick-off meetings, providing the city another touch point with the community to manage expectations regarding schedules and impact of work.

Information about this project will be posted at the following Ohio EPA website: <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 stormwater management system, which involves the construction of bioretention areas. 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 road rights-of-way and in residential areas that have been previously disturbed.

Is cost effective because GI practices are an effective and less expensive way to address stormwater than gray infrastructure practices. The long-term cost of this alternative was considered when selecting the preferred alternative.

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. This project will address resident concerns about water-in-basement problems.

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 and will reduce or slow the volume of stormwater discharge.

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

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.

Contact Information

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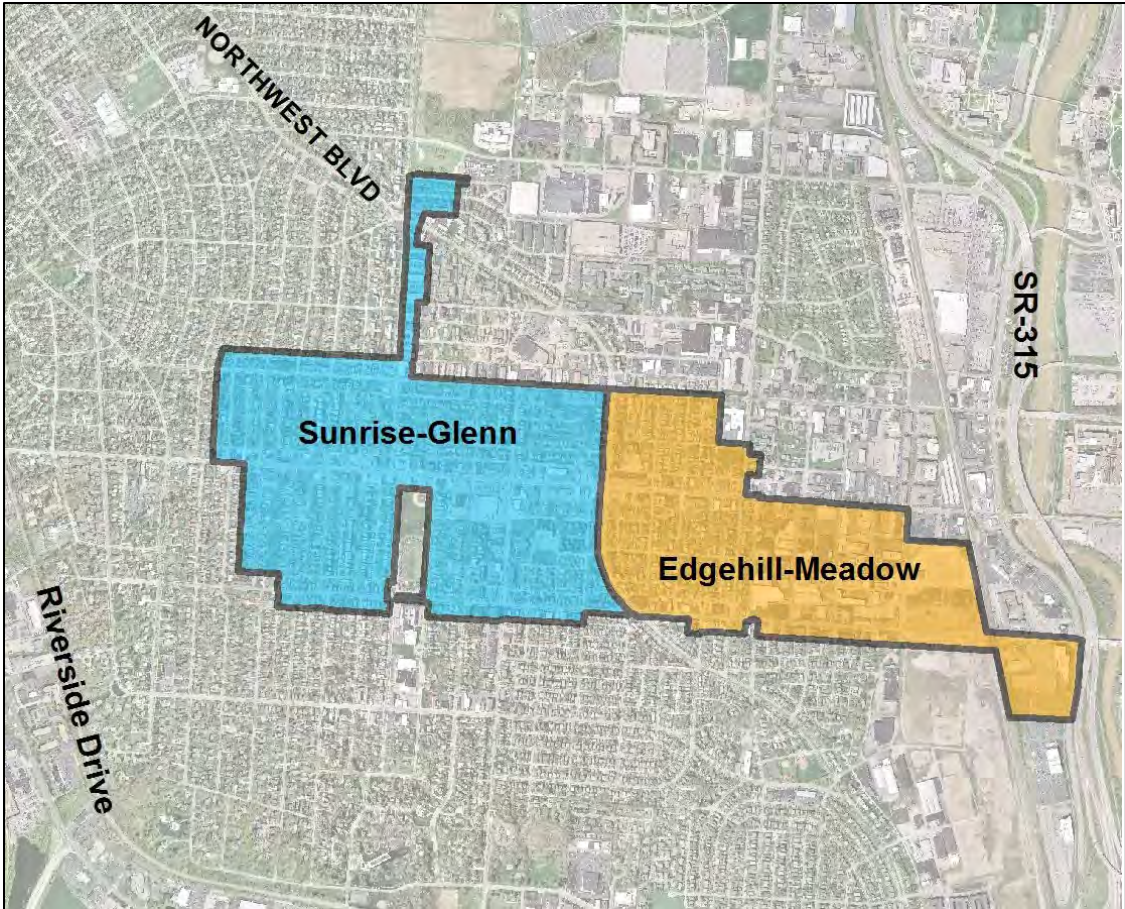


Figure 1. Fifth by Northwest study area

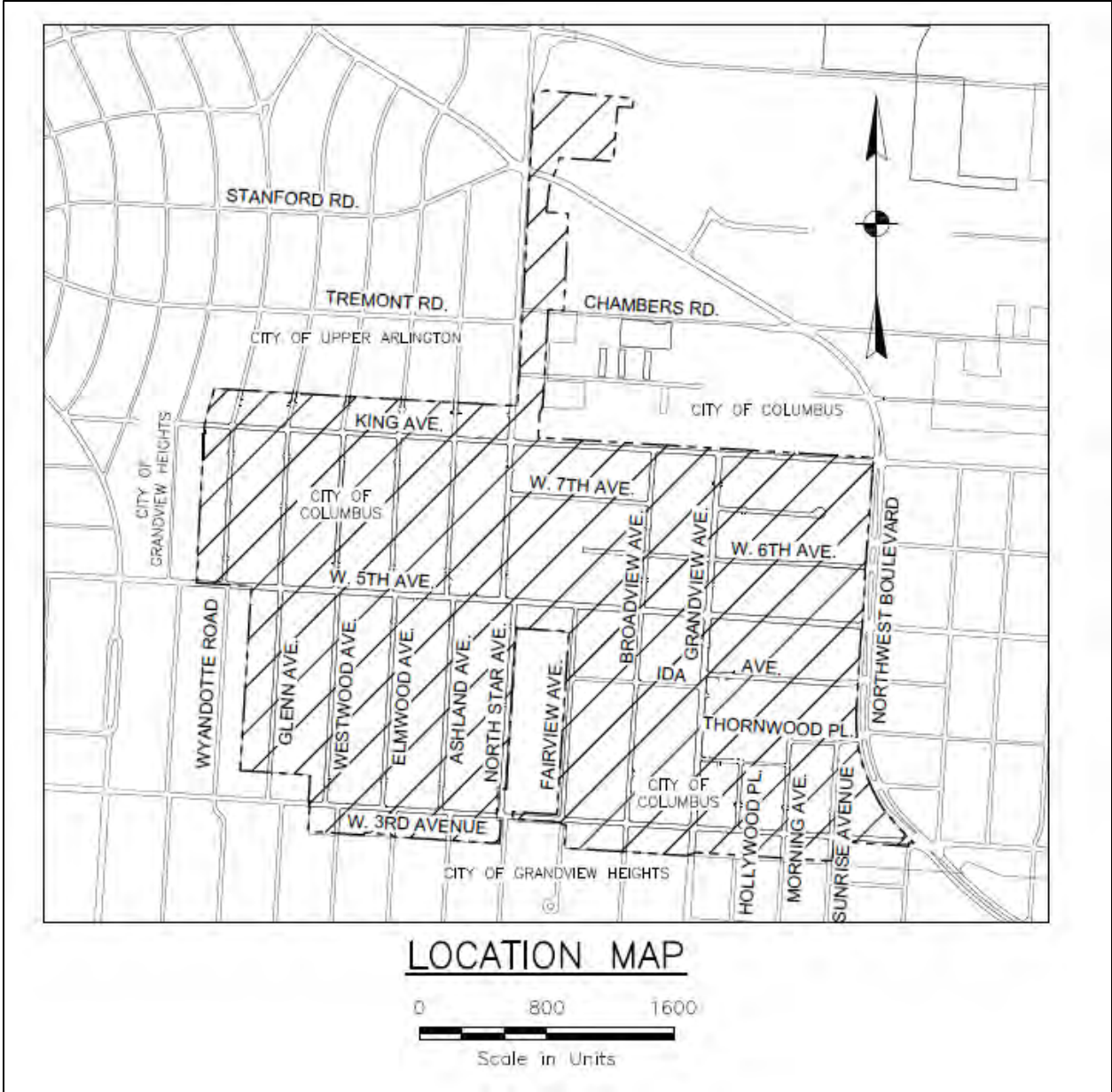


Figure 2. Project area streets

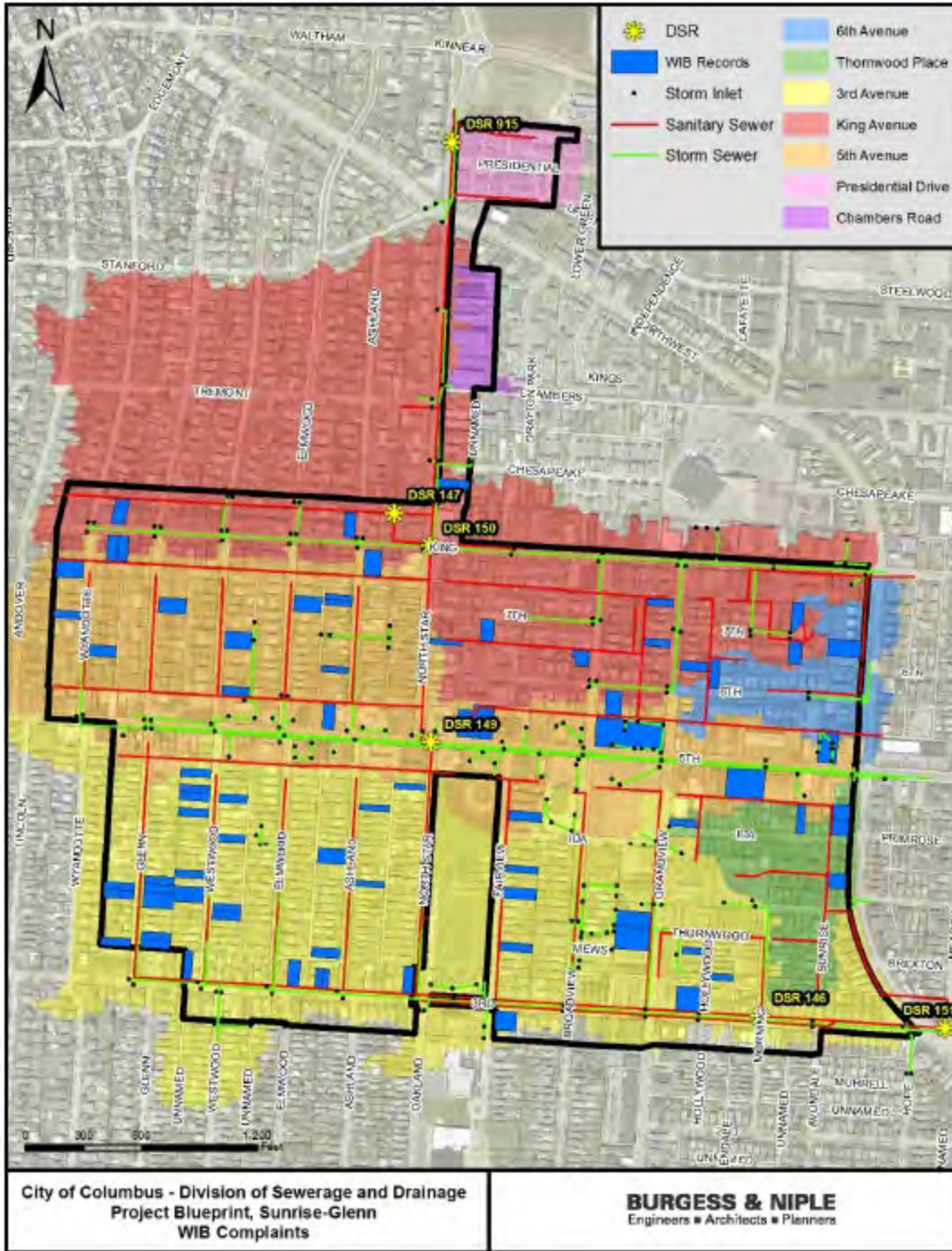


Figure 3. Locations of water-in-basement complaints

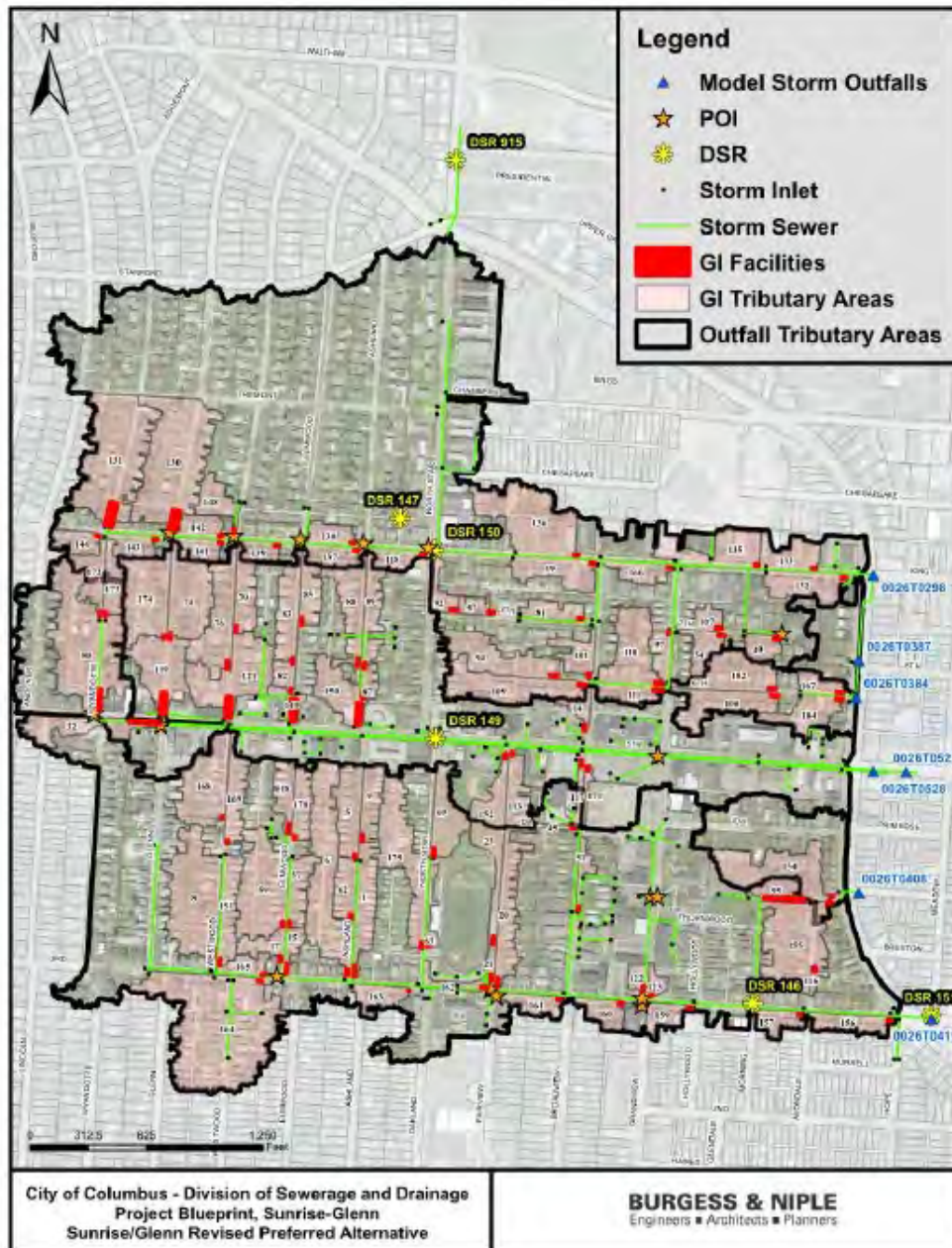


Figure 4. Locations of proposed rain gardens (GI facilities)