



March 5, 2025

Limited Environmental Review and Finding of No Significant Impact

**City of Columbus - Franklin County
Greenlawn Low Head Dam Improvements
Loan number: CS390274-0395**

The attached Limited Environmental Review (LER) is for a low head dam improvement 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,

A handwritten signature in black ink, reading "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Greenlawn Low Head Dam Improvements

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

Loan Number: CS390274-0395



Figure 1. Franklin County

Project Summary

The City of Columbus in Franklin County has requested \$2,100,000 from the Water Pollution Control Loan Fund (WPCLF) for improvements to the Greenlawn Low Head Dam. This project will protect utility infrastructure within the dam as well as reduce the risk of surface water bacteria levels and sediment discharge from potential dam failure. As the project involves rehabilitation to the existing structure, environmental impacts are expected to be limited. A Nationwide Permit was obtained by the Army Corps of Engineers for temporary in-water maintenance work within the Scioto River.

History & Existing Conditions

The City of Columbus owns, operates, and maintains a complex sewer system that includes both separate and combined sewers. The system generally drains from north to south where it 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.

The Greenlawn Avenue Low Head Dam (Greenlaw Dam) is owned and operated by the City of Columbus and is located just upstream of the Greenlawn Avenue Bridge spanning the Scioto River. Originally constructed in the 1930s, the Greenlawn Dam sits just south of downtown Columbus and contains the 10.5 feet wide by 5.5 feet tall Olentangy-Scioto Intercepting Sewer (OSIS). The OSIS is a critical component of Columbus' sewer infrastructure, and any structural failure of the dam could risk major sewage spilling into the Scioto River.

The Ohio Department of Natural Resource (ODNR)'s 2016 inspection of the Greenlawn Dam indicated that concrete repairs and vegetation removal are required at the north and south abutments. The concrete repair areas at the abutments include the relatively accessible 12-inch-thick reinforced concrete slabs located along the riverbanks as well as the river by-pass structure on the north side. The north abutment of the dam is accessed via a gated entrance within Scioto Audubon Metro Park off of West Whittier Street. The south abutment is accessed via Greenlawn Avenue adjacent to the South Franklinton Firehouse. The dam is currently classified as an intermediate hazard, Class II structure.

Project Description

In response to the visual inspection of the Greenlawn Dam, improvements will be made in order to preserve the dam's integrity and prevent potential failure, as well as protect the existing utility infrastructure within. Exposed reinforcement, structural cracks, scattered holes, and deteriorated concrete will be filled, repaired, or replaced. Vegetation will be removed, and the area will be cleared of debris.

Construction for this project will largely remain within the footprint of the existing structure, thereby minimizing effects on environmental resources. A Nationwide Permit No. 3 (Maintenance) has been obtained from the Army Corps of Engineers for temporary in-water work. Stream channel modification is limited to the minimum necessary for the repair of the structure and construction shall be completed during low flow conditions to the greatest extent possible. The contractor is responsible for best management practices to control erosion and sedimentation and minimize the creation of dust during construction.

See figures 2 and 3 below for a map and photo of the project area.

Green Lawn Dam Rehabilitation Project Area Boundary

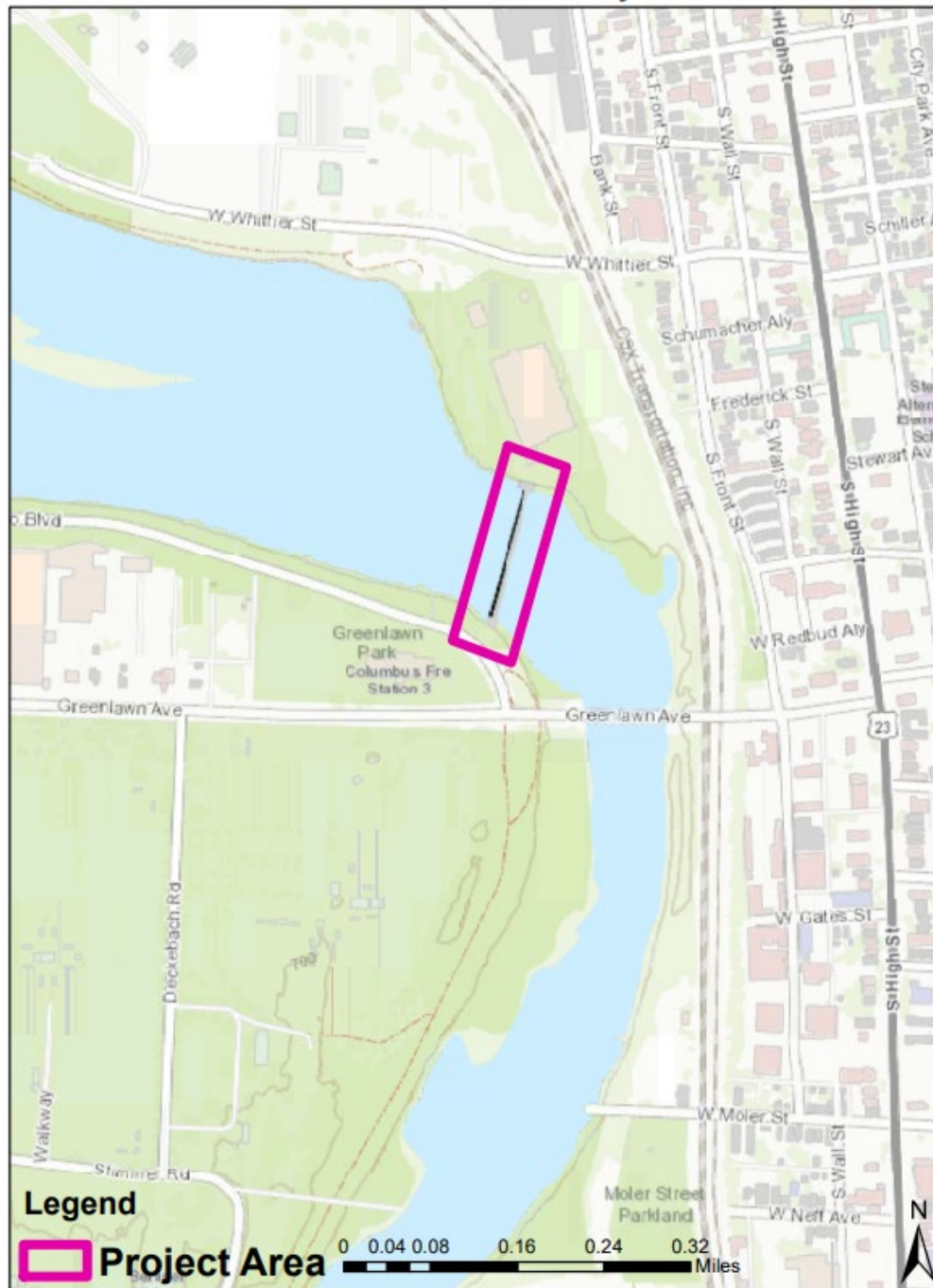


Figure 2. Project area



Figure 3. Greenlawn Avenue Low Head Dam

Implementation

Columbus requested \$3,100,000 from the WPCLF over a 20-year loan period at the standard rate of 3.01%. When compared to the market rate of 4.26%, Columbus will save over \$500,000. Interest rates are set monthly and may change for a different loan award date.

The current annual Columbus residential stormwater rate is approximately \$104. Residential bills with the implementation of this and other associated stormwater projects are expected to increase to approximately \$124, or 0.2% of median household income (MHI) of Columbus, which is \$62,994. By using WPCLF financing for this project, Columbus has minimized the economic impact on customers.

The anticipated loan award will occur in March 2025; construction will begin following loan award and is expected to be completed by April 2026.

Public Participation

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. The City of Columbus' Public Utilities webpage details the proposed construction project and contact information is provided for any public questions or concerns. A virtual public meeting is anticipated to take place.

Conclusion

The proposed project meets the criteria for a Limited Environmental Review (LER); namely, it is an action for the replacement of existing infrastructure within the wastewater system. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Has no significant environmental effect, no effect on high-value environmental resources, and does not require extensive specific impact mitigation.

This project is for the rehabilitation of an existing structure, which lacks important environmental features. A Nationwide Permit No. 3 (Maintenance) has been obtained from the Army Corps of Engineers for temporary in-water work. Stream channel modification is limited to the minimum necessary for the repair of the structure and construction shall be completed during low flow conditions to the greatest extent possible. Standard construction best management practices will be required to control dust, sediment runoff, noise, and maintain safety.

Is cost effective and not controversial.

The proposed project is the best feasible alternative as it will avoid the costly effects of dam failure to the Scioto River and Olentangy-Scioto Intercepting Sewer if no action takes place. DEFA is unaware of any specific opposition to or controversy about this project.

Does not create a new or relocate an existing discharge to surface or ground waters, 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, and will not provide capacity to serve a population substantially greater than the existing population.

This project involves rehabilitation of an existing low head dam and will not increase wastewater discharges, nor provide capacity to serve a greater population. There will be no change in pollutant loading.

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 improve the Greenlawn Low Head Dam to reduce the risk of surface water bacteria levels and sediment discharge in the Scioto River due to potential dam failure. Improvements to the low head dam will also protect the existing wastewater system infrastructure located within the dam.

Contact Information

Kristin Parrish
Division of Environmental and Financial Assistance
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
Columbus, Ohio 43215

Email: kristin.parrish@epa.ohio.gov
Phone: 614-644-3662