



August 31, 2023

Limited Environmental Review and Finding of No Significant Impact

**City of Columbus – Franklin County
Inflow Redirection for Kerr/Russell Area
Loan number: CS390274-0401**

The attached Limited Environmental Review (LER) is for a combined sewer overflow elimination and 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,

Jonathan Bernstein for

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Inflow Redirection for Kerr/Russell Area

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

Loan Number: CS390274-0401

Project Summary

The City of Columbus in Franklin County is requesting \$6 million in low-interest funding from the Ohio Water Pollution Control Loan Fund (WPCLF) for a combined sewer overflow elimination and stormwater management project in downtown Columbus.

History & Existing Conditions

The City of Columbus 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 gray improvements, the city explored other alternatives. In 2012, 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) technologies into the WWMP.

The project area concerns the Kerr/Russell combined sewer overflow (CSO) manhole, labeled CSO 08, located south of the intersection of Kerr Street and Russell Street. The overflow at this location discharges to the Scioto River via a 125-inch storm sewer. To address this CSO, stormwater management is needed. Additionally, green infrastructure will help reduce stormwater flows.

Project Description

This project will result in elimination of CSO 08, located just north of Interstate 670 in downtown Columbus. New storm sewer pipes will re-direct wet weather flow from the combined sewer system that flows to CSO 08. New 12-inch sanitary sewer will be installed to connect to a new regulator structure. The existing 48-inch combined sewer will be lowered to accommodate the new storm sewer and connect to the proposed regulator. New 18-inch combined sewer will be installed as well, downsizing the existing 36-inch combined sewer to allow for the new storm sewer. These realignments of sanitary and storm sewers will allow for better construction access and less interference with water lines and other utilities. All ten storm sewer inlets along Warren Street and Kerr Street will be redirected from the existing combined sewer to the proposed storm manholes. This project will redirect public runoff from 19.7 acres in the Kerr/Russell sewershed (figures 1, 2).

The project will also include constructing approximately 15,000 square feet of permeable paver surface (green infrastructure), either as roadway or parking areas. The pavers will help mitigate peak runoff stormwater but more importantly will reduce Total Suspended Solids (TSS) which would otherwise flow to a storm sewer and ultimately to the Scioto River.

Implementation

The City of Columbus is requesting \$6 million from the WPCLF. This project qualifies for a 0.25% green reserve discount off the standard interest rate of 2.66% for a 2.41 % interest rate on a 20-year loan. This will save the city approximately \$1.1 million for the life of the loan compared to the market rate of 3.91%. 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 projected average monthly residential user rate is \$68.29, or \$819 annually, which is 1.5 % of the MHI. By using WPCLF financing for this project, Columbus has minimized the economic impact on customers.

The estimated date of project initiation is January 2025 with completion by January 2026.

Public Participation

The biggest outreach effort has been coordination with the Italian Village Commission of the (Columbus) Historic Preservation Office. The project design team met with the commission on May 14, 2021, to discuss project alignment, materials, and approach. The commission reviewed the plans twice to confirm Columbus wasn't causing unacceptable impacts to the neighborhood, changing any historic features, or using materials which don't comply with current commission standards.

The City of Columbus will also have information about this project on their website. In addition, 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 existing public wastewater collection 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 because no high-value environmental resources are in the project area. Disturbed areas will be re-seeded after construction.

Will have no effect on high-value environmental resources because none are in the project area and sufficient precautions, such as erosion control, will be taken to prevent environmental impacts off-site.

Is cost effective because this was the feasible option after three alternatives were considered that were either more expensive, carried more environmental risk, or required more change orders during construction.

Is not a controversial action because this project needs to be done to address a consent order.

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 addresses current stormwater flows and actually allows for the elimination of a discharge point.

Will not provide capacity to serve a population substantially greater than the existing population because this project addresses stormwater and CSO problems for an existing local population.

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.

The addition of the proposed storm sewer, redirected storm inlets, and green infrastructure will allow the Kerr/Russell drainage area to meet the goals and requirements of the WWMP. This project will also allow for the elimination of a CSO discharge to the Scioto River.

Contact Information

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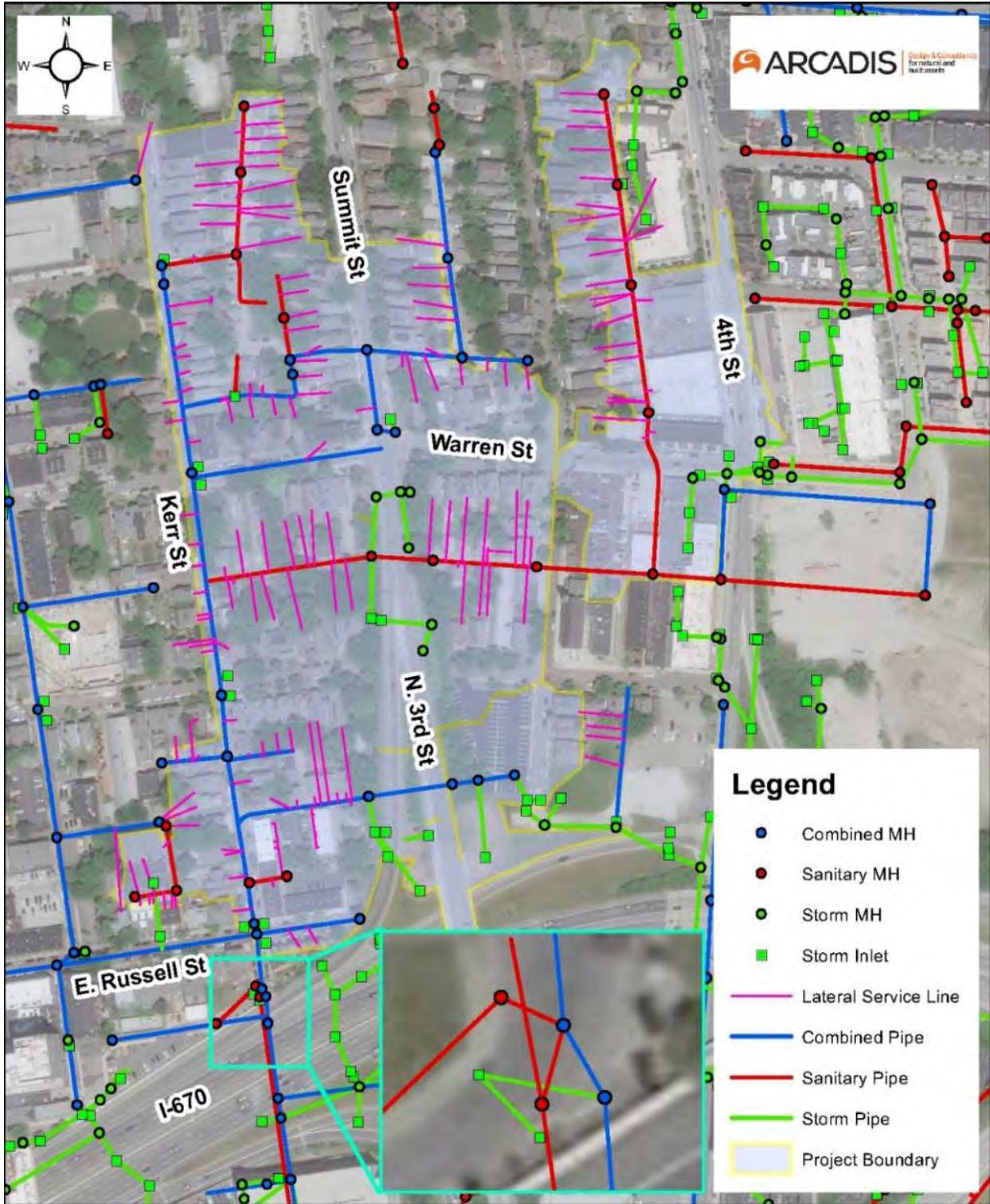


Figure 1. Project area

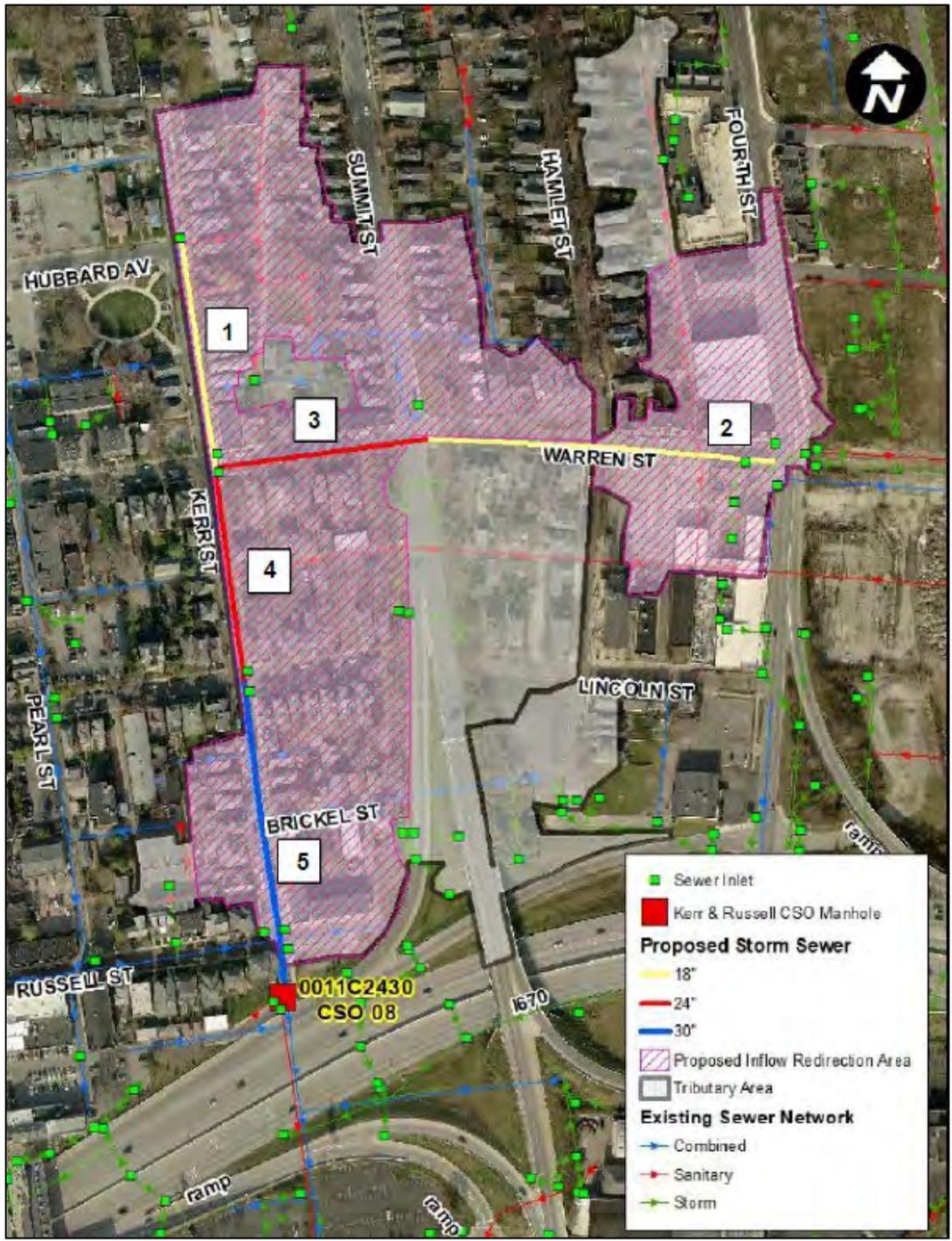


Figure 2. Proposed storm sewer location