August 20, 2020

Limited Environmental Review and Finding of No Significant Impact

City of Columbus – Franklin County
Blueprint Linden GI – Agler/Berrell
Loan number: CS390274-0276

The attached Limited Environmental Review (LER) is for a stormwater 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
Assistant Chief
Division of Environmental and Financial Assistance

Attachment
LIMITED ENVIRONMENTAL REVIEW

Project Identification

Project: Blueprint Linden GI – Agler/Berrell
Applicant: Columbus Department of Public Utilities
910 Dublin Road - 4th Floor
Columbus, Ohio 43215
Loan Number: CS390274-0276

Project Summary

The City of Columbus, in Franklin County (Figure 1), is requesting a $3,600,000 low-interest loan from the Ohio Water Pollution Control Loan Fund (WPCLF) to construct green infrastructure as part of an integrated plan to address combined sewer overflows and water-in-basement problems.

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. 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 17 study areas, each roughly 1,000 acres in size. Every study area is broken into four to five project areas. Blueprint Linden is one of those 17 study areas and is comprised of four separate and distinct project 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 (see Figure 2). 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 overfill sewers and cause overflows.

The Agler/Berrell Project Area (see Figure 3) is 212 acres generally bounded by Agler Road on the north, Genesee Avenue on the south, Cleveland Avenue on the west, and Berrell Avenue on the east...
and includes 70 acres of impervious surface that causes significant storm water runoff. Approximately 30,242 feet of public 6-inch to 96-inch storm sewers convey the storm flows to outfalls which discharge into streams that flow less than a mile to Alum Creek.

The homes and infrastructure in the project area were largely built after WWII and much of the stormwater infrastructure is deficient by current standards. Street flooding and ponding after rainfall occur at numerous intersections, street curbs, and rights-of-way area throughout the project area.

The area poses challenges for GI design. Off-street parking on uncurbed streets and use of right-of-way area by adjacent property owners may limit GI options in the right-of-way. A majority of sanitary sewers are located in rear alleyways, making alleyway stormwater management a concern. Vacant or abandoned parcels exist and may provide space for localized GI facilities or low-impact development measures such as bioretention facilities.

**Project Description**

To better manage storm water and minimize its impacts to the sanitary sewer system, Columbus will install 21 small bioretention facilities (Figure 4) and 11 street bump-outs (Figure 5), both of which look like “rain gardens,” at strategic locations in the project area (Figure 6), and a pervious sidewalk along the east side of Cleveland Avenue covering 0.6 acres. The project also includes restoration to or enhancement of 18 catch basin inlets.

**Implementation**

The City of Columbus is requesting a $3,600,000 low-interest loan from the WPCLF to construct green infrastructure. Columbus qualifies for the standard low-interest loan rate of 0.53% and a 0.25% Green Project Reserve Discount which will save the city $590,310 for a 20-loan compared to the market rate, which is currently at 1.78%.

The median household income (MHI) of Columbus is $44,774. The projected average annual residential sewer bill is $713/year which is 1.6% of the MHI. This compares favorably to the Ohio average annual residential sewer bill, $715, which is 1.1% of state MHI. A sewer bill less than 1.8% of MHI is typically considered affordable.

**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:

- 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.
- Road shows were held at community events, festivals, libraries, and community and civic centers.
- The City developed a video explaining Blueprint Columbus: [www.columbus.gov/blueprint](https://www.columbus.gov/blueprint).
- 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/Templates/Detail.aspx?id=2147494011](https://www.columbus.gov/Templates/Detail.aspx?id=2147494011)
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 http://epa.ohio.gov/defa/ofa.aspx.

**Conclusion**

The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is an action within an existing public wastewater collection system which involves improvements to stormwater infrastructure. 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 previously disturbed areas 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.

- **Is not a controversial action** because the City is addressing a stormwater problem that must be addressed while working closely with the residents to make sure they are satisfied with the design of the project.

- **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 minimizes storm water entry into the sanitary sewer system and does not otherwise alter the city’s sanitary sewage collection or treatment system. The project will help minimize storm water discharge increasing storm water infiltration.

- **Will not provide capacity to serve a population substantially greater than the existing population** because this project deals with existing stormwater issues in a developed area.

**Contact information**

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Figure 2. Wet weather issues
Figure 3. Project Area
Figure 4. Typical right-of-way bioretention facility

Figure 5. Typical curb bump-out cross section
Figure 6. Project area with green infrastructure locations