



July 3, 2024

Limited Environmental Review and Finding of No Significant Impact

**City of Columbus – Franklin County
BP Hilltop GI/PP – Eureka/Fremont
Loan number: CS390274-0273
Eureka/Fremont Area Water Line Improvements
Loan number: FS390274-0389**

The attached Limited Environmental Review (LER) is for a stormwater management project and a water infrastructure replacement project in Columbus which the Ohio Environmental Protection Agency intends to finance through its Water Pollution Control Loan Fund (WPCLF) and Water Supply Revolving Loan Account (WSRLA) below-market interest rate revolving loan programs. The LER describes the projects, 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 and WSRLA program review and approval process. We have concluded that the proposed projects should not result in significant adverse environmental impacts. This projects’ relatively narrow scope and lack of environmental impacts qualifies them 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 projects have changed significantly.

Sincerely,

Steve Malone, for

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Projects: BP Hilltop GI/PP – Eureka/Fremont
Eureka/Fremont Area Water Line Improvements

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

Loan Numbers: CS390274-0273
FS390274-0389



Figure 1. Franklin County

Project Summary

The City of Columbus is requesting funding from the Ohio Water Pollution Control Loan Fund (WPCLF) to finance the BP Hilltop GI/PP – Eureka/Fremont project. Work for the project will include construction of green infrastructure (GI) and permeable pavement (PP) to capture stormwater and prevent flooding in the Hilltop neighborhood of Columbus. The city is also requesting funding from the Water Supply Revolving Loan Account (WSRLA) to finance the replacement of water mains, new fire hydrants, and valves in the same neighborhood.

History & Existing Conditions

In 2002 and 2004, the City of Columbus entered into two State of Ohio consent orders 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 order. 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 2014, 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 Hilltop neighborhood of Columbus, also known as the Eureka/Fremont area, is one such project area that has suffered from extensive stormwater flooding in recent years. City records show surface and street flooding at 80 different locations from 2003 through 2017, and sanitary sewer backups into 178 homes since 2002. The area has separated sanitary and storm sewer systems; however, both were constructed in the early 1900's and are in need of repair. To reduce the flooding, Columbus looked at green infrastructure to better handle the heavy rainfall events. The project area also has a history of water in basement (WIB) issues. The

majority of WIB complaints were caused by sewer lateral backups and local flooding caused by blocked or restricted storm sewers. The sanitary sewer issues will be addressed in a separate project.

The water line project is part of a joint venture project with the Division of Sewerage and Drainage. It provides for construction of new water mains, abandoning existing water mains, and transferring water service lines in the Eureka/Fremont Area. The project is necessary to replace aged water mains that require repeated regular maintenance. Replacing the mains will provide a longer life of the water mains with reduced maintenance. Water mains in the project area are experiencing costly repairs at approximately \$5,000 per break.

The City of Columbus operates three large interconnected municipal water treatment plants: Hap Cremean Water Plant (HCWP), Dublin Road Water Plant (DRWP), and Parsons Avenue Water Plant (PAWP). The raw water source is the Scioto River. These plants treat and supply clean water to Columbus and a large part of Franklin County for customer potable water uses. There are no existing drinking water problems.

Project Description

The project area for both projects (see Figure 2) is bound by Broad Street (north), Sullivant Avenue (south), Wheatland Avenue (east), and Hague Avenue (west). Overall, separate storm and sanitary sewers in the area flow from north to south and west to east. The project area consists of 297 acres, including a school, hundreds of residential properties, and numerous commercial, retail, and institutional properties, too.

The green infrastructure (GI) project consists of utilizing eight bioretention cells in the boulevard segments on Burgess Avenue and Terrace Avenue between Olive Street and Fremont Street, as well as the selected landbank GI parcels within the project area (see Figure 3). In order to provide a positive storm sewer outlet for the boulevard bioretention and mitigate flooding along Palmetto Street, this project includes upsizing and redirecting existing storm sewers on Palmetto Street and Fremont Street and upsizing the existing 48-inch sewer in Richardson Avenue from Palmetto Street to Wicklow Road. Some landbank parcels also require new storm sewer where a viable outlet is not available.

There will also be a combination of permeable parking and full street permeable pavement. The locations are Sheridan Street between Wheatland Avenue and Oakley Avenue, Richardson Avenue from Wicklow Road to Palmetto Street, and Wayne Avenue between Palmetto Street and Wicklow Road. The full width pervious paver installations will require continued coordination with the Department of Public Service, due to scheduled resurfacing projects within the area.

The water infrastructure project provides for construction of 9,200 linear feet of 6-inch and 8-inch new ductile water mains that have an estimated service life of 100 years, abandoning existing water mains, and transferring water service lines in the Eureka/Fremont Area (see Figure 4). New copper water taps will also be installed.

Implementation

The City of Columbus proposes to borrow approximately \$9.1 million from the Ohio WPCLF at the standard interest rate of 2.73%. WPCLF interest rates are set monthly and may change for a later loan award. Assuming a 20-year loan, borrowing this amount in WPCLF dollars could save Columbus approximately \$1.4 million over the life of the loan compared to the current market rate of 3.98%.

Columbus has a 6% sewer rate increase planned for 2024 and 2025. The average annual sewer bill for residents served by Columbus is \$648. This is 1.1% of the median household income (MHI: \$58,575) and is higher than the Ohio average annual sewer bill, \$490. Construction is scheduled to begin in August 2024 and take two years to complete.

In addition, the City of Columbus proposes to borrow \$959,273 from the Ohio WSRLA at the standard interest rate of 2.73%. WSRLA interest rates are set monthly and may change for a later loan award date. Assuming a 20-year loan, borrowing this amount in WSRLA dollars could save Columbus approximately \$150,000 for the life of the loan compared to the current market rate of 3.98%. Construction is scheduled to begin September 2024 and be completed by September 2026.

The current Columbus annual residential water bill is approximately \$544. Projected annual residential water bills with the implementation of this and other associated projects are expected to increase to approximately \$665, or 1.2% of median household income (MHI) of Columbus, which is \$54,902. By using WSRLA financing for this project, Columbus has minimized the economic impact on customers.

Public Participation

For the stormwater GI project, there was a public meeting in June 2018 and October 2019 to discuss the project. In addition, there was a virtual meeting with the Highland West Civic Association in October 2020 and a virtual public meeting in June 2021 to go over the project with the public.

Annual notices of water main rehabilitation and replacement projects are posted on the Division of Water's web site. Notices are also distributed to affected residents prior to construction. The public will have the opportunity to review the legislation prior to City Council approving the funds for the project. Four public meetings were held, two in person and two virtual. Another public meeting will be held in August 2024, right before the start of construction.

Ohio EPA is unaware of opposition to or controversy about the project. Ohio EPA will make a copy of this document available to the public on its web page: <https://epa.ohio.gov/divisions-and-offices/environmental-financial-assistance/announcements> and will provide it on request to interested parties.

Conclusion

The proposed projects meet the criteria for a Limited Environmental Review (LER); namely, they are actions which involves the construction of green infrastructure and permeable pavement, as well as replacement of existing water lines. Furthermore, the projects meet the other qualifying criteria for an LER; specifically, the proposed projects:

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. Some trees will be removed as part of both projects, however Columbus committed to restrict tree removal to between October 31 and March 31 to protect any endangered bat species.

Are cost effective and not controversial actions because GI practices are an effective and less expensive way to address stormwater issues than gray infrastructure practices. Also installing

new water line and appurtenances will minimize costly repairs. Ohio EPA is unaware of opposition to or controversy about these projects.

Does not create a new, or relocate an existing discharge to surface or ground waters, does not create a new source of water withdrawals from either surface or ground waters, significantly increase the amount of water withdrawn from an existing water source, or substantially increase the volume of discharge or loading of pollutants from an existing source or from new facilities to receiving waters because these projects do not include a new discharge point or otherwise impact the public water system. The GI project will reduce or slow the volume of stormwater discharge. The new water lines will have no effect on receiving waters. Neither project involves withdrawal of groundwater or discharge of pollutants.

Will not provide capacity to serve a population substantially greater than the existing population because the projects deal with existing stormwater and drinking water issues and do 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 projects as they relate 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 GI project will reduce street flooding, benefiting area residents. The water line and appurtenance upgrades will ensure long-term safe water distribution while minimizing the costs associated with frequent maintenance of failing pipes.

Contact Information

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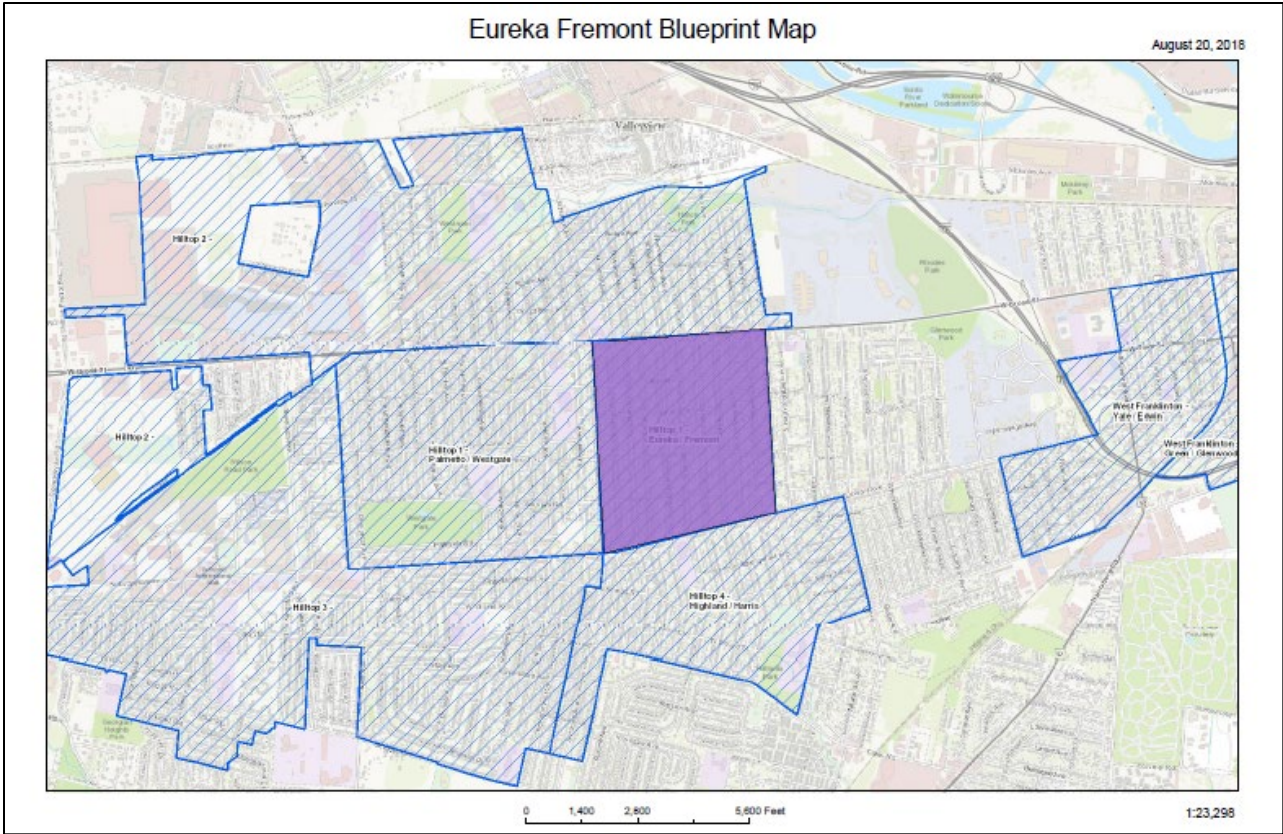


Figure 2. Location of the Eureka/Fremont area

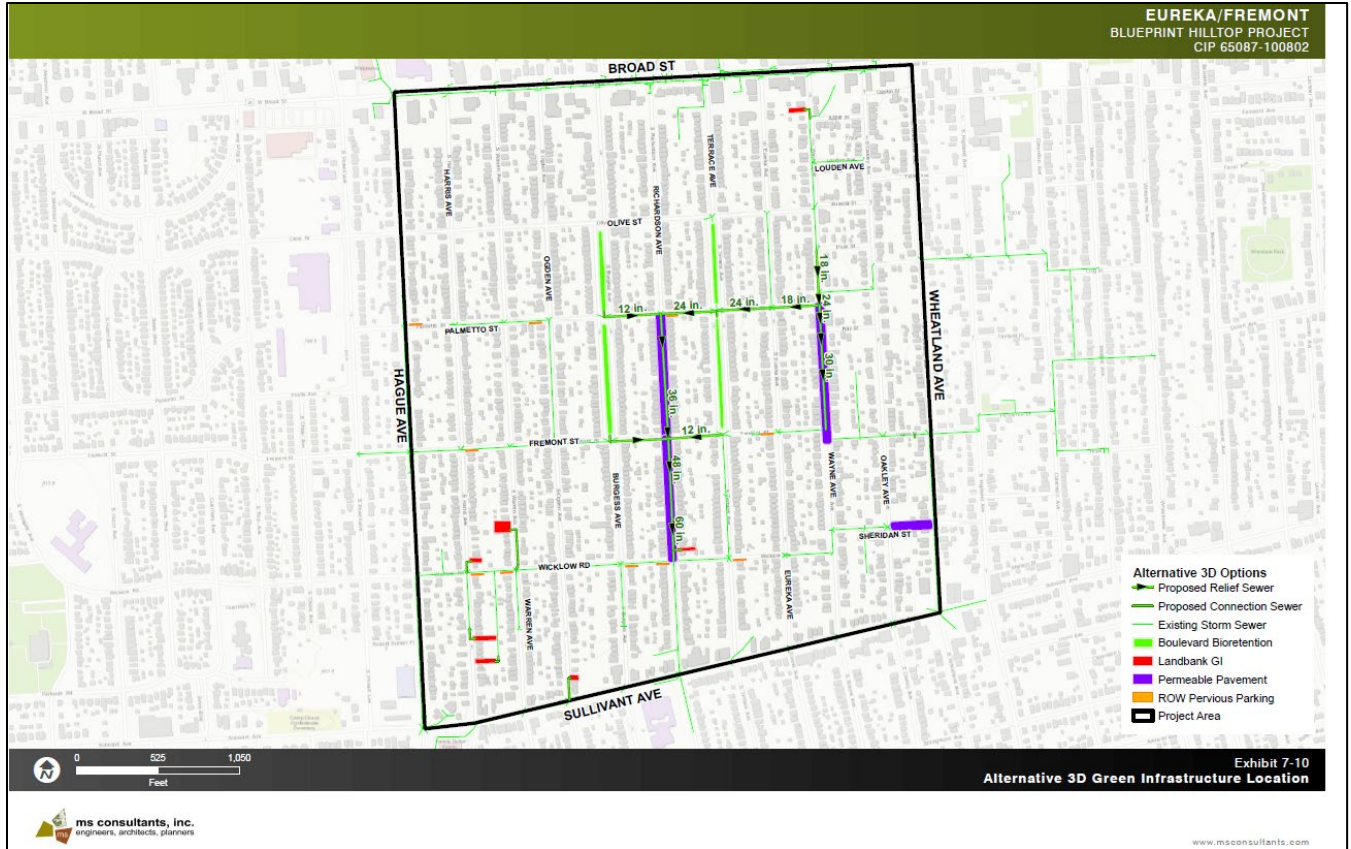


Figure 3. Location of proposed green infrastructure practices



Figure 4. Location of new water lines