



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

October 30, 2020

**Limited Environmental Review and Finding of No Significant Impact**

**City of Columbus – Franklin County  
Blueprint Linden GI - Artane & Parkwood  
Loan number: CS390274-0277**

The attached Limited Environmental Review (LER) is for a stormwater management project in Franklin County 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*

Jonathan Bernstein, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Project: Blueprint Linden GI – Artane and Parkwood

Applicant: Columbus Department of Public Utilities  
910 Dublin Road - 4<sup>th</sup> Floor  
Columbus, Ohio 43215

Loan Number: CS390274-0277



**Figure 1. Franklin County**

### **Project Summary**

The City of Columbus, in Franklin County (Figure 1), is requesting a \$4,300,000 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 overflow sewers and cause overflows.

The Artane and Parkwood area (see Figure 3) is in the southeast region of the Blueprint Linden area. The Artane and Parkwood Project Area is primarily residential, with commercial properties lining

the major arterial streets. The project area receives stormwater from the west (Hudson/McGuffey) and conveys stormwater to the north (Agler/Berrell) and to the south (out of the Blueprint Linden area.)

There are four locations where stormwater leaves the Artane and Parkwood project boundary (see Figure 4). The Artane and Parkwood project area has several land bank, tax-delinquent, and vacant properties. In addition to Joan Park, located in the east-central region of Artane and Parkwood, these locations hold the potential for cost-saving regional green infrastructure.

### **Project Description**

Following initial screening, bioretention and permeable pavement were identified as the preferred GI practices. This includes a large stormwater detention facility in Joan Park (Basin A) (see Figure 4).

The primary focus of the Blueprint Linden effort is to utilize non-right-of-way (NROW) green infrastructure (GI) to repurpose blighted properties and create an asset for the community that provides stormwater benefits. Properties evaluated for potential GI practices included the following:

- City-Owned Parcels (Joan Park)
- Reserved Land Bank Parcels
- Certified Tax-Delinquent Parcels
- Empty Parcels (lacking structures)
- Vacant Parcels (vacant structures)
- City Right-of-Way

However, land bank and certified tax-delinquent parcels are not always where key points of interest (POIs) are located, for this reason green infrastructure within the right-of-way was utilized as a secondary focus to fill in known trouble areas that more regional type basins can't address.

Overall, thirteen locations for ROW GI were determined. These locations would treat 7.7 acres and are sited in areas where limited land bank or tax-delinquent properties are located to help supplement attainment of project goals of peak reduction and limited increase in point of interest (POI) flooding. These ROW options will supplement the numerous non-ROW GI already identified (see Figure 4).

All practices will be installed in previously disturbed areas (i.e., right-of-way, City-owned land bank parcels, and parks.) Cross sections of the GI practices are represented in figures 5 and 6.

### **Implementation**

The City of Columbus is requesting a \$4,300,000 low-interest loan from the WPCLF to construct green infrastructure. Columbus qualifies for the standard low-interest loan rate of 0.52% and a 0.25% Green Project Reserve Discount which will save the city \$704,668 for a 20-year loan, compared to the market rate, which is currently at 1.77%.

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 is higher than 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 project 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](http://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>

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 can be 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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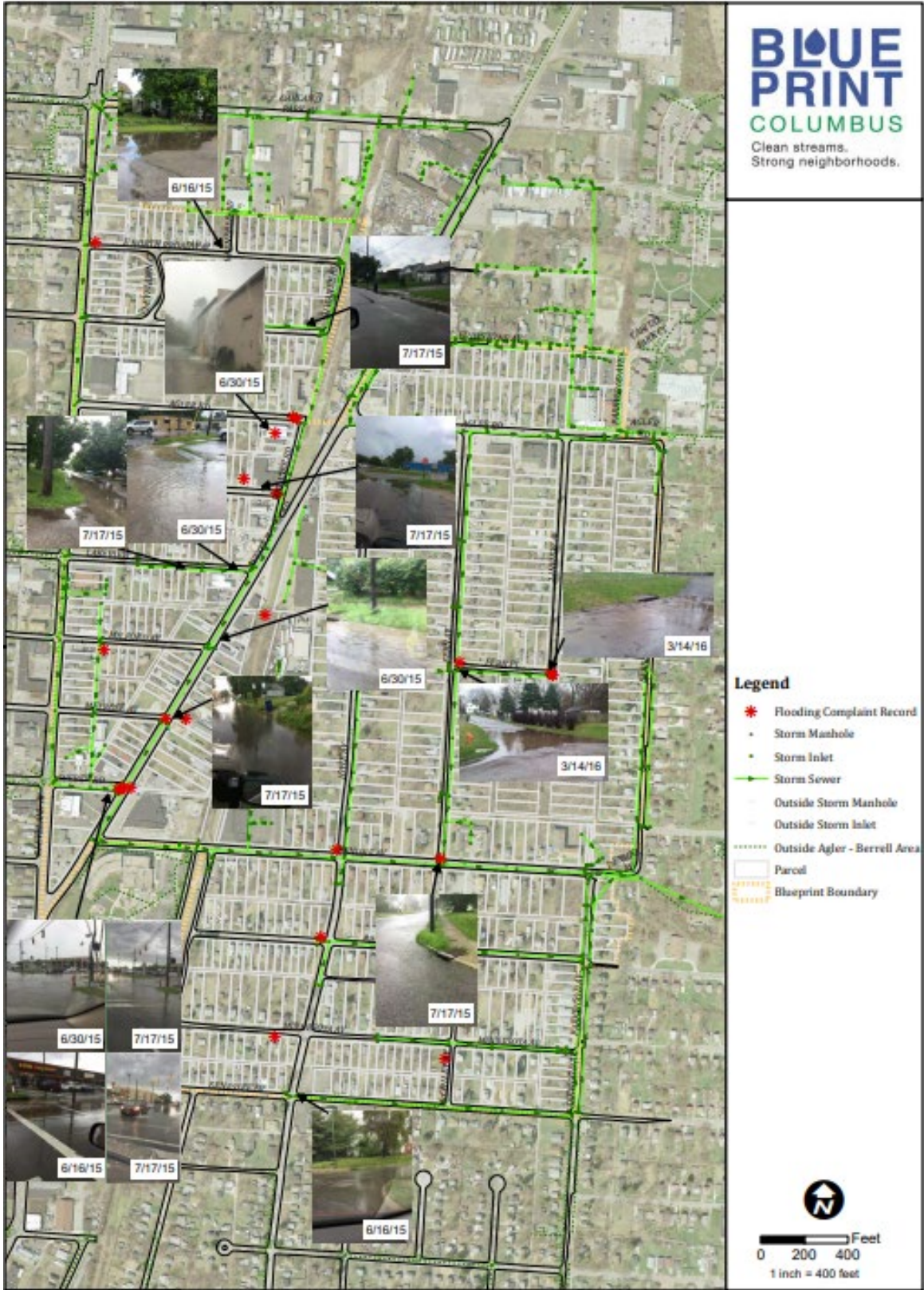


Figure 2. Wet weather issues in Linden area

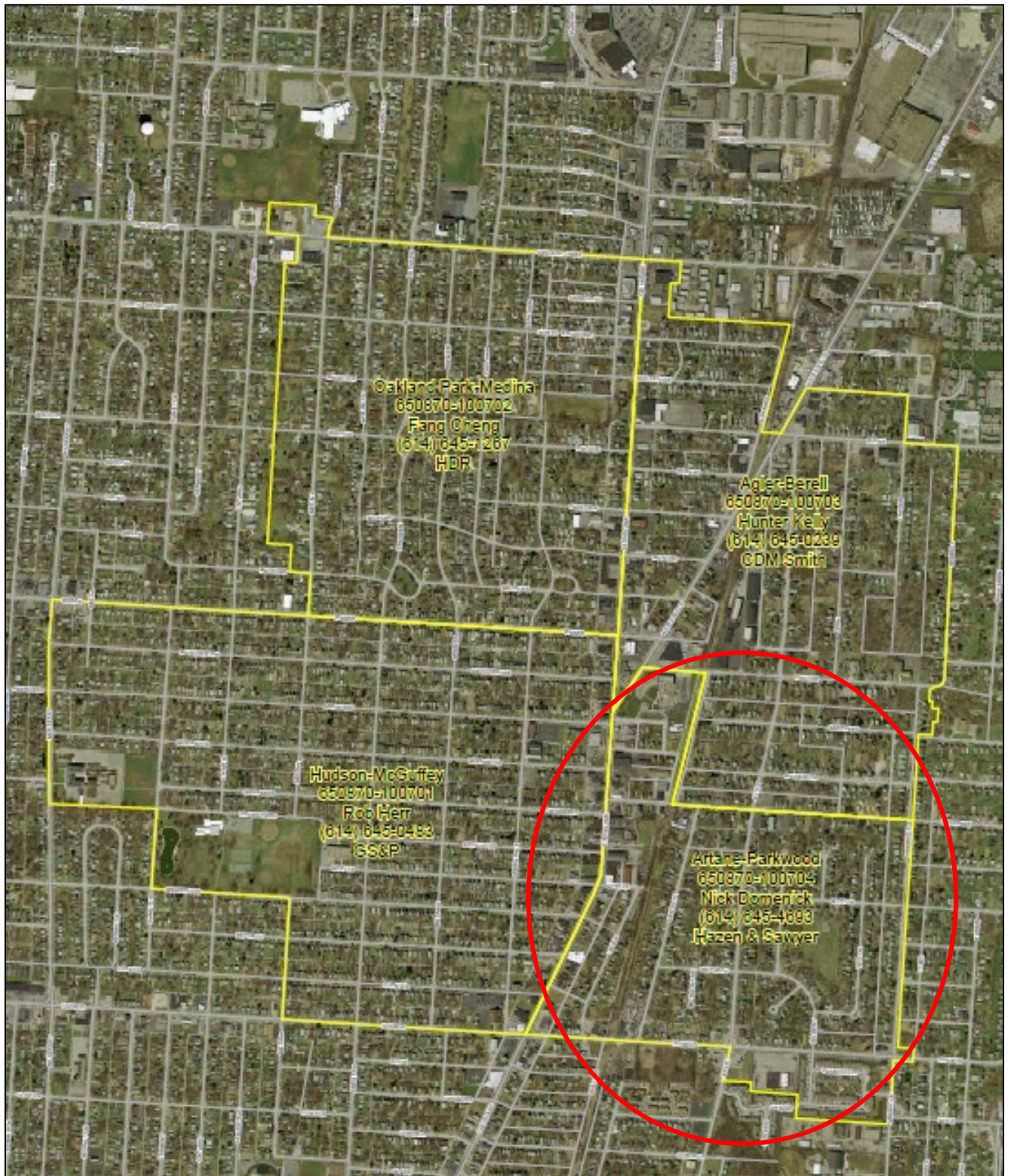


Figure 3. Location of Artane and Parkwood area within Linden area

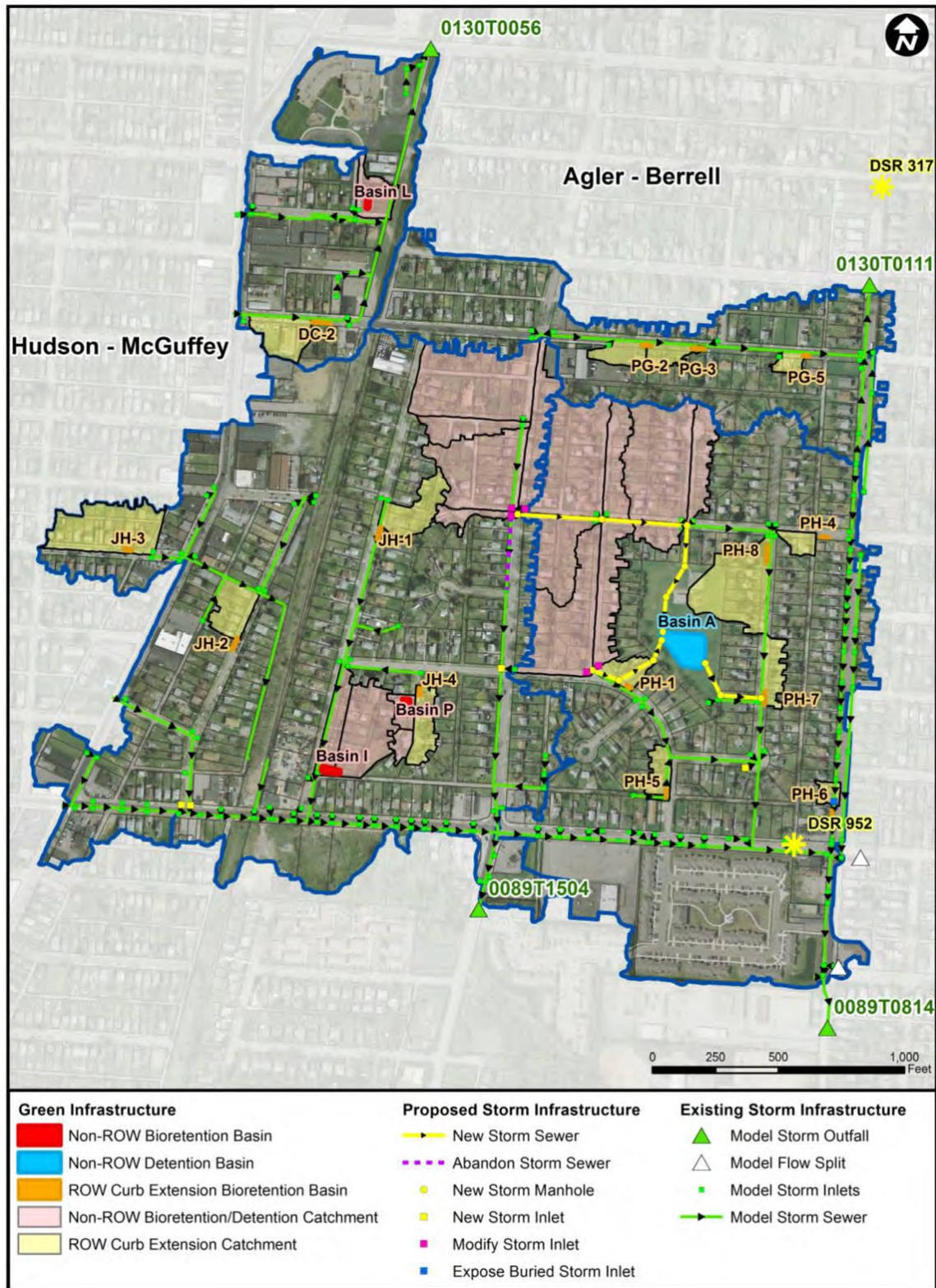


Figure 4. Outfall locations, and proposed GI practices



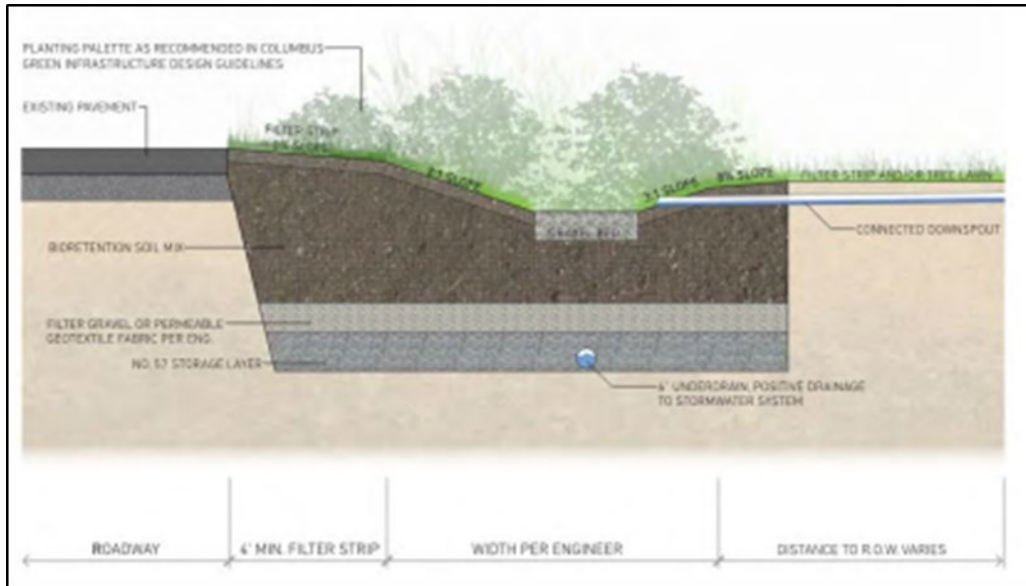


Figure 5. Typical right-of-way bioretention facility

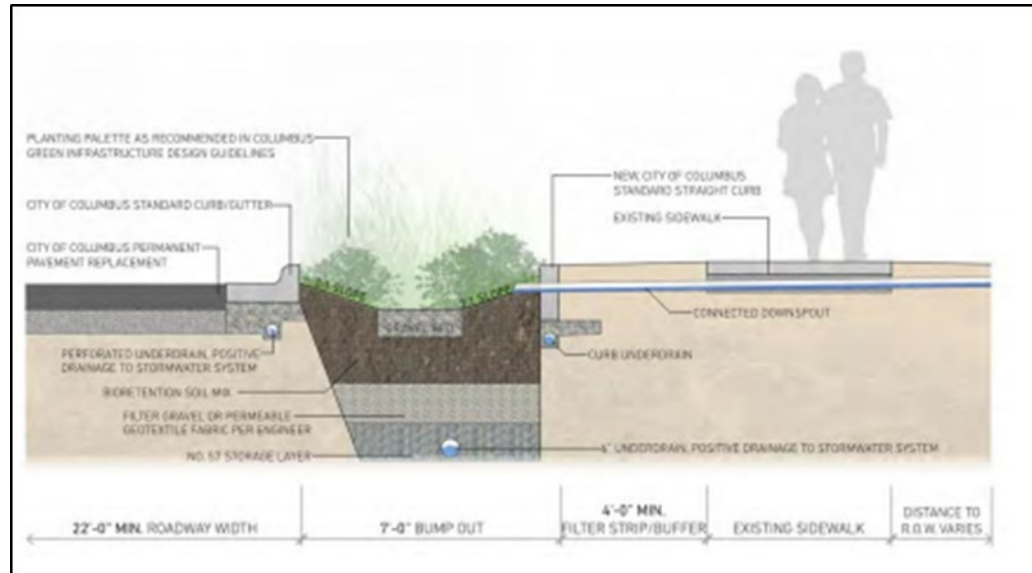


Figure 6. Typical curb bump-out cross section