



**Mike DeWine**, Governor  
**Jon Husted**, Lt. Governor  
**Anne M. Vogel**, Director

**May 3, 2023**

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

**City of Columbus – Franklin County  
Blueprint Linden GI – Hudson/McGuffey  
Loan number: CS390274-0278**

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,

A handwritten signature in cursive script that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Project: Blueprint Linden GI – Hudson/McGuffey

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

Loan Number: CS390274-0278

### **Project Summary**

The City of Columbus in Franklin County is requesting a \$7,500,000 low interest loan from the Ohio Water Pollution Control Loan Fund (WPCLF) to construct green infrastructure practices as part of an integrated plan to address sanitary sewer overflows (SSO) and water-in-basement (WIB) problems. The city qualifies for a green reserve discount.

### **History & Existing Conditions**

The City of Columbus submitted its wet weather management plan (WWMP) to the Ohio EPA in 2005 to outline how the city planned to meet the compliance criteria established within their 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. Due to the high cost of gray improvements, the city explored other alternatives. In 2012, with Ohio EPA approval, the 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.

Blueprint (BP) Columbus consists of 17 study areas, each roughly 1,000 acres in size. Every area is broken into four to five project areas. BP 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). BP Linden is roughly bounded to the north by Oakland Park Avenue, Berrell Avenue and Parkwood Avenue to the east, East Hudson Street to the south, and McGuffey Road to the west (Figure 1).

BP Linden's project area collection infrastructure is heavily taxed during wet weather events. With eight designed sewer relief (DSR) points over 850 acres (Figure 2), Linden is impacted by sanitary sewer overflows (SSO) on a regular basis. DSR 305 (at East Lakeview and Cleveland Avenue) is the epicenter of the city's SSO activity, activating nine times in 2012. And since 2005, there have been a total of 917 WIB complaints within the Linden area. DOSD maintenance staff has indicated that few WIB complaints are due to upstream manhole surcharges. Most complaints are attributed to localized blockages. Storm sewers in the Linden project area are regularly reported to contain heavy debris, grease, grit and gravel, owing to the age of the Linden area infrastructure and inflow and infiltration (I/I).

## **Project Description**

The Hudson/McGuffey area is the focus of this BP Linden project. The area is bounded by East Weber Road (north), Cleveland Avenue (east), Hudson Street (south) and McGuffey Avenue (west). The project area consists of 287 acres including 1,466 properties and approximately 39,200 feet of storm sewer and 42,775 feet of sanitary sewer. Multiple alternatives were considered; below is the description of the selected alternative (see Figure 3).

Construction will include 27,225 square feet of pavers, 15 bioswales totaling 6,752 square feet, 24 bump-outs totaling 8,625 square feet and 33 ROW basins totaling 13,939 square feet.

Two regional bioretention areas were determined to be feasible to meet the BP goals. These bioretention ponds will be located at 1515 Arlington Avenue (the southwest corner of Arlington Avenue and Bremen Street) and 1383 Manchester just west of Medina Avenue. Both properties have been acquired by the City of Columbus DOSD.

Bioswales will be constructed in areas that do not have curb and gutter sections to facilitate the necessary grading to allow for runoff to enter and exit the bioretention facility. Most of the north-south streets within the study area meet this requirement, allowing for significant opportunity to implement bioswales. Proposed bioswales will be located along Ontario Street, Medina Street, Bremen Street, and Greenwich Street.

Curbed bump-outs are located on east-west streets within the study area where pavement width could be reduced. There are limited options available for bump-outs in the study area due to limitations on street width and other siting considerations.

Curbed right-of-way (ROW) basins will be located on north-south streets within the study area where sidewalks were proposed as part of this project or space for future sidewalks had to remain. The ROW basins allowed for GI to be constructed where limited width was present.

Permeable pavers will be installed in existing designated on-street parking and larger public parking areas as well as areas where open space has been turned into parking areas by residents. Permeable pavers will also be installed in the southern parking lane of seven blocks of East Weber Road.

## **Implementation**

The City of Columbus is requesting a \$7,500,000 low-interest loan from the WPCLF to construct green stormwater infrastructure. Columbus qualifies for the standard rate of 2.58% with a 0.25% Green Project Reserve Discount which will result in a 2.33% interest rate. This will save Columbus \$1,156,000 compared to the market rate loan which is currently at 3.83%.

The median household income (MHI) of Columbus is \$54,902. The projected average monthly residential user rate is \$64.78, or \$777 annually, which is slightly more than the Ohio average of \$749 per year.

WPCLF interest rates are set monthly and may change for a later loan award.

## **Public Participation**

The city met with residents who will have GI in front of their houses. Construction barrels were placed at the proposed GI location to clearly mark the bump-outs. All the rain gardens and bump-outs that raised concerns have been either removed or reduced in size.

There were four presentations to the North Linden Area Commission about this project during the design period. Information is also available on the city's Facebook neighborhood discussion forums.

The city met with the design consultants to enhance the aesthetic aspects of the rain gardens, including replacing poured concrete walls with stone walls and adding winter interest plants. The city is also working with residents to select their preferred plants.

All GI locations (bump-outs and behind-the-curb) were spray painted and a yellow sign with contact info was installed.

The city will also begin pre-construction meetings, which gives the city another touch point with the community to manage expectations regarding schedules and impact of work.

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:

<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 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 a less expensive way to address stormwater than gray infrastructure practices.

**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 does not include a new discharge point and will reduce the volume of stormwater flowing to the WWTP by assimilating some of the stormwater via GI practices.

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

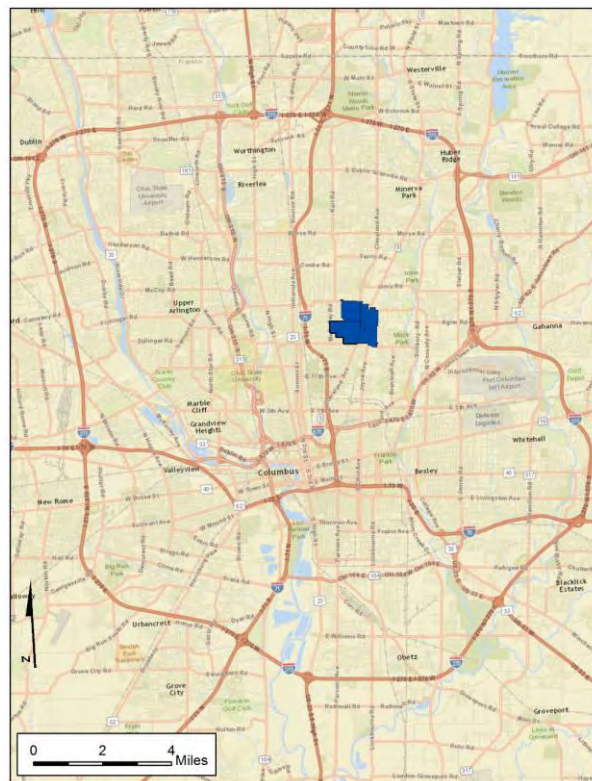
Based upon Ohio EPA's review of the planning information and the materials presented in this Limited Environmental Review, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to the environmental features discussed previously. This is because these 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 project will help reduce water-in-basement events and protect water quality by reducing combined sewer discharges to Alum Creek.

**Contact Information**

Linda Merchant-Masonbrink, Environmental Planner  
Ohio EPA, Division of Environmental & Financial Assistance  
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**Figure 1. BP Linden area**

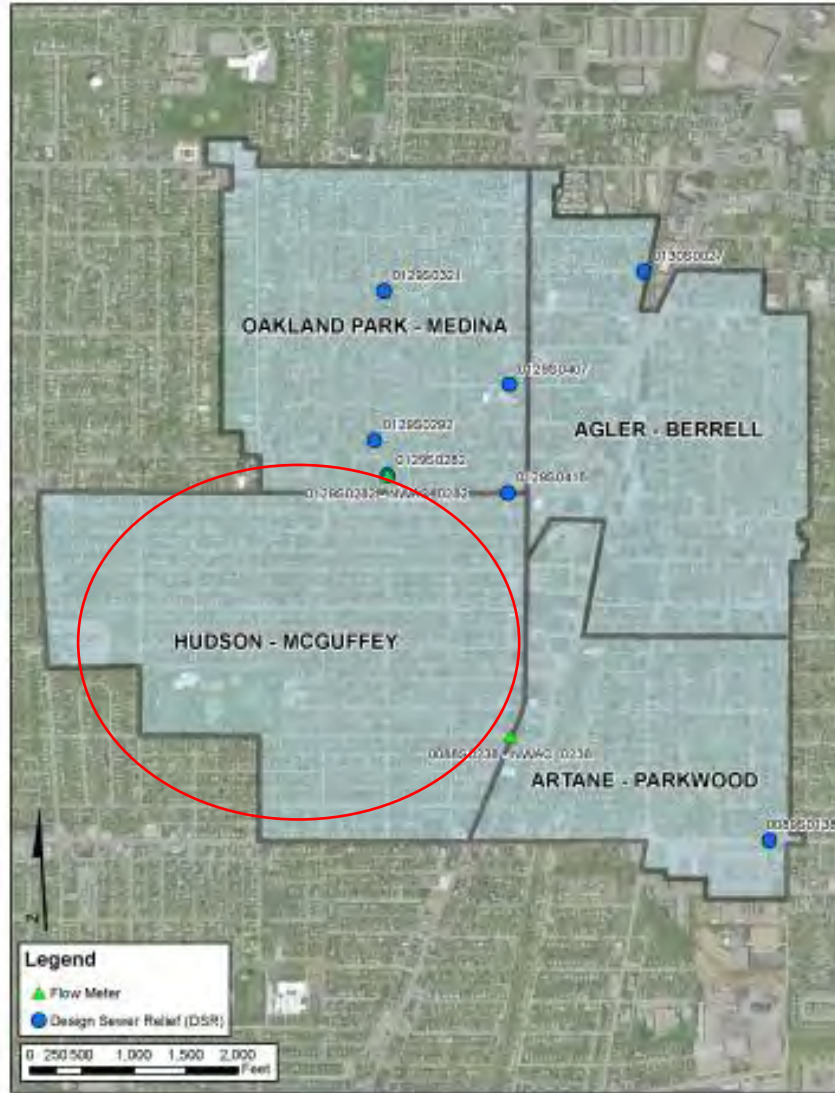


Figure 2. Hudson/McGuffey location

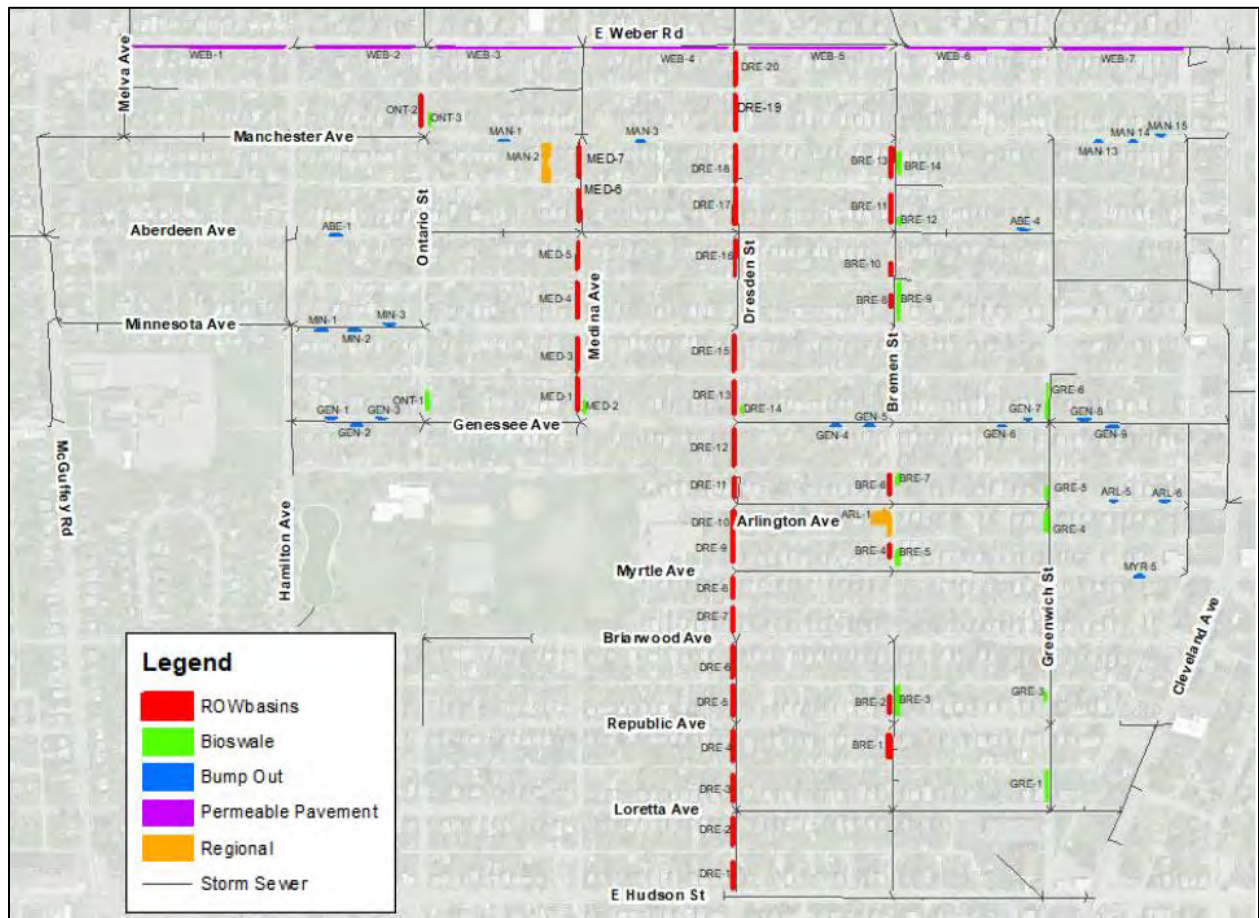


Figure 3. Location of green infrastructure construction