

# July 7, 2021

## Limited Environmental Review and Finding of No Significant Impact

### City of Columbus – Franklin County Old Beechwold Area Stormwater System Improvements Loan number: CS390274-0298 Old Beechwold Area Water Line Improvements Loan number: FS390274-0336

The attached Limited Environmental Review (LER) is for a stormwater management project and water line improvement 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 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,

Kathleen Courtright, for

Jonathan Bernstein, Assistant Chief Division of Environmental and Financial Assistance

Attachment

#### LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

Project: Old Beechwold Area Stormwater System Improvements Old Beechwold Area Water Line Improvements

- Applicant: Columbus Department of Public Utilities 910 Dublin Road Columbus, Ohio 43215
- Loan Number: CS390274-0298 FS390274-0336



#### Project Summary

Figure 1. Franklin County

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 stormwater management improvements as part of an integrated plan to address combined sewer overflows and water-in-basement problems.

In addition, the City of Columbusis also requesting \$2,897,608 from the Ohio Water Supply Revolving Loan Account (WSRLA) as a joint venture between Old Beechwold Area Stormwater System Improvements project with the Division of Sewerage and Drainage to install new water lines and appurtenances in the Old Beechwold Area.

## **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.

The Old Beechwold area is one of the green infrastructure stormwater management target areas in Columbus. The project area is residential with about 140 homes constructed between 1920 and 1960. It is generally bounded on the north by West Jeffrey Place, on the east by North High Street, on the south by Rustic Place, and on the west by the Olentangy River. This project will contribute to the reduction of pollutants overflowing into the Olentangy River.

The existing water mains in the Old Beechwold area are in need of replacement. This project will install new ductile iron water mains that have an estimated service life of 100 years. Completing this

water main replacement project will significantly reduce the frequent maintenance of the water mains. The water line replacement project is located near W. Jeffrey Place and N. High Street, as well as a few other locations.

## **Project Description**

To better manage storm water and minimize its impacts on the sanitary sewer system, Columbus will install approximately 9,200 linear feet of storm sewer, 185 inlets and manholes, and two bioretention basins (Northwest Regional and Jastram Regional) (figures 2, 3, 4). The project is being designed and constructed jointly with Old Beechwold Area Water Line Improvements.

The water main project includes construction of 10,000 linear feet of 6-inch and 8-inch ductile iron water mains, copper water taps, new fire hydrant and valve installations, abandonment of existing water mains, and transferring water service lines in the Old Beechwold Area (see Figure 5). It is expected these new water mains will have an estimated 100-year service life. This replacement is necessary as the existing mains are requiring repeated maintenance which can cost \$5,000 per break

## **Implementation**

The City of Columbus is requesting a \$3,600,000 low-interest loan from the WPCLF to construct green infrastructure and \$2,897,608 from the WSRLA to replace water mains. Columbus qualifies for the standard low-interest loan rate of 0.54% for the water line improvements project, and an additional 0.25% Green Project Reserve Discount for the green infrastructure project. Over a 20-year loan period, Columbus will save \$496,653 by using WPCLF funding and \$399,171 by using WSLRA funding, compared to the market rate, which is currently 1.79%.

The median household income (MHI) of Columbus is \$44,774. The average annual sewer bill for Columbus residents is \$711, which is 1.6% of the MHI and is slightly higher than the statewide average of 1.3%.

The average annual water rate for Columbus residents is 377 which is less than the statewide average of 639 and 0.84% of the MHI.

The green infrastructure project will take 12 months to complete. The water line replacement project should be complete by August 2022.

# 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 BlueprintColumbus: <u>www.columbus.gov/blueprint</u>.
- 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: <u>https://www.columbus.gov/Templates/Detail.aspx?id=2147494011</u>

The Old Beechwold Association has been an active participant in project development. The association had the opportunity to review and comment on preliminary plans, and provide input on location of green infrastructure and plant species. The City of Columbus attended several association meetings to inform residents on project progress; conducted a public meeting; and attended several site visits with the design consultant and association members. Preservation of trees is a major concern of residents.

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.

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 <u>http://epa.ohio.gov/defa/ofa.aspx.</u>

# <u>Conclusion</u>

The proposed projects meet the project type criteria for a Limited Environmental Review (LER); namely, they are actions within an existing public wastewater collection system which involves improvements to stormwater infrastructure and water distribution system that requires new infrastructure. 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 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 costly way to address storm water than gray infrastructure. Additionally, replacing old water lines will result in reduced, costly maintenance. Replacing the mains will provide a longer and more cost-effective life of the water mains.

**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. The project was designed to limit impact to trees to the extent possible to address resident concerns. The water line replacement project will protect public health and reduce costs of maintenance which is beneficial to the public. The project is in a Historic District (Figure 6), however the local Historic Resources Commission, who considers how projects may impact historic characteristics of the district, does not object to the project. The project will not impact historic buildings.

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. Does not create a new, or relocate an existing discharge to surface or ground waters, and does not create a new source of water withdrawals from either surface or ground waters, or 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 the water main replacement will not result in any increased discharges to groundwaters or surface waters, nor will it impact withdrawals.

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

## **Contact information**

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Figure 2. Green infrastructure project area



Figure 3. Northwest Regional bioretention basin detail



Figure 4. Jastram Regional biobasin detail



Figure 5. Location of the water line improvement project



Figure 6. Project area within an Historic District