

December 6, 2018

Mr. John Newsome, PE
Administrator
City of Columbus, Division of Sewerage & Drainage
Stormwater & Regulatory Management Section
910 Dublin Road
Columbus, Ohio 43215

Attn: Mr. Greg Fedner, PE
Private Development Section Manager

Re: **Columbus Municipal Light
Plant**
Type I Variance from
Stormwater Drainage Manual

Dear Mr. Fedner,

On behalf of Connect Realty, E.P. Ferris and Associates, Inc. (EPF) is submitting an application for a Type I variance from the City of Columbus Stormwater Drainage Manual (Manual) for the redevelopment of the Columbus Municipal Light Plant located in the Downtown Zoning District. The following provides information pertaining to the requested variance from Section 3 Stormwater Controls of the Manual by outlining the property's history and the existing site challenges.

The proposed redevelopment site (project site) is located on the south side of W. Nationwide Boulevard, adjacent to the Olentangy River (River), on portions of two (2) parcels identified as Franklin County PID's 010-294235-00 and 010-066777-00, currently owned by Municipal Light Plant LLC and the City of Columbus, respectively. The 1.75-acre project site is within approximately 500 linear feet of the top of bank of the River, is within Zone AE Special Flood Hazard Area found on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Number 39049C0309K (See Figure 1), Revised June 17, 2008, and has a total site disturbed area of approximately 0.9 acres. The existing building is located on the Municipal Light Plant LLC parcel with associated parking and drives overlapping on the City of Columbus parcel. The redevelopment of the project site is proposed for commercial use.

The following excerpts have been taken from the National Register of Historic Places Registration Form dated October 21, 2015 which provides a summary of the project site history and photographs (See Figure 2).

Municipal Light Plant is an early 20th – century utilitarian Romanesque Revival building constructed in 1903-1904, with an Art Deco inspired addition at the east end constructed in phases between 1937-1954. Three distinct building forms reflect the associated construction dates: the original electrical generation plant, the boiler house, and the new generation plant. All spaces of the light plant are connected and built as additions to the original structure. The original generation plant exhibits a nine bay red brick façade, original paired double-hung wood windows with fanlights, stone stills, arched window heads, brick corbelling, and a projecting central entry of

matching details. The boiler house is located to the south of the generation plant, characterized by red brick and a nine bay façade of matching details. The interior of the building consists of large open spaces that house existing equipment, boilers, and control rooms. Concrete floors, exposed steel structure, open metal catwalks and stairs remain throughout. The electric substation grid structure, dating to 1974, remains at the southeast corner of the property. Columbus' Municipal Light Plant retains a high degree of historical integrity, with the overall appearance and character of the building and secondary structures remaining largely unchanged from the historic period.

Section 3 Stormwater Controls of the Manual provides criteria and guidance for the successful design of facilities that control stormwater discharges from development and redevelopment projects to prevent flooding, streambank erosion, and water quality impairment in downstream areas.

Connect Realty is requesting a variance from Section 3 of the Manual for the redevelopment of the project site, specifically a variance from providing stormwater quantity control due to its existing nature and the desire to revitalize a historical building. Much of the project site is located within Zone AE Special Flood Hazard Area as shown in Figure 1 with a 1% Annual Chance Flood elevation of 720.4. Section 3.1 General Criteria of the Manual prohibits stormwater control facilities within designated FEMA floodplain boundaries. There is small area of the project site along the west end of the existing building that is outside of the designated FEMA floodplain boundary; however, this area is occupied by both a portion of the existing building and utility services which limit the installation of sufficient stormwater controls. Also, the invert elevation of the connection storm sewer in W. Nationwide Boulevard (3083-E) at the northwest corner of the existing building is at 719.60 which would prohibit gravity flow from the proposed storm sewer system along the south side of the building. Please refer to Sheet 7 of the Private Storm Sewer and Grading Plan (CC-18117) for grading details of the project site (Figure 3).

To provide stormwater controls for the project site, the developed area would need to be raised above the base flood elevation (approximately 4 to 6 feet), removing the historical New Generation Building, and applying for a Letter of Map Revision (LOMR) to FEMA. Thus, compliance with Section 3 of the Manual will result in a significant hardship to Connect Realty and a significant loss of a historical building.

EPF appreciates your time in considering this request. To this point we have made our team available to meet and discuss the request and will continue to do so. This is a challenging site with several obstacles as well as an opportunity to redevelop a historical building in the downtown district.

Sincerely,

E. P. FERRIS & ASSOCIATES, INC.



Christopher L. Lescody, PE

Vice President

Attachments: Figure 1 - FEMA FIRM and Flood Profiles
Figure 2 - National Register Photograph Key and Photographs
Figure 3 - Sheet 7 of Storm and Grading Plan CC-18117



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

	Without Base Flood Elevation (BFE) Zone A, V, A99 With BFE or Depth
	Regulatory Floodway Zone AE, AO, AH, VE, AF

	0.2% Annual Chance Flood Hazard. Area of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile (Zone X)
	Future Conditions 1% Annual Chance Flood Hazard Zone X
	Area with Reduced Flood Risk due to Levee. See Notes, Zone X
	Area with Flood Risk due to Levee Zone D

	Area of Minimal Flood Hazard Zone X
	Effective LOMRS

	Area of Undetermined Flood Hazard Zone
	Channel, Culvert, or Storm Sewer Levee, Dike, or Floodwall

	Cross Sections with 1% Annual Chance Water Surface Elevation
	Coastal Transect
	Base Flood Elevation Line (BFE)
	Limit of Study
	Jurisdiction Boundary
	Coastal Transect Baseline
	Profile Baseline
	Hydrographic Feature

	Digital Data Available
	No Digital Data Available
	Unmapped

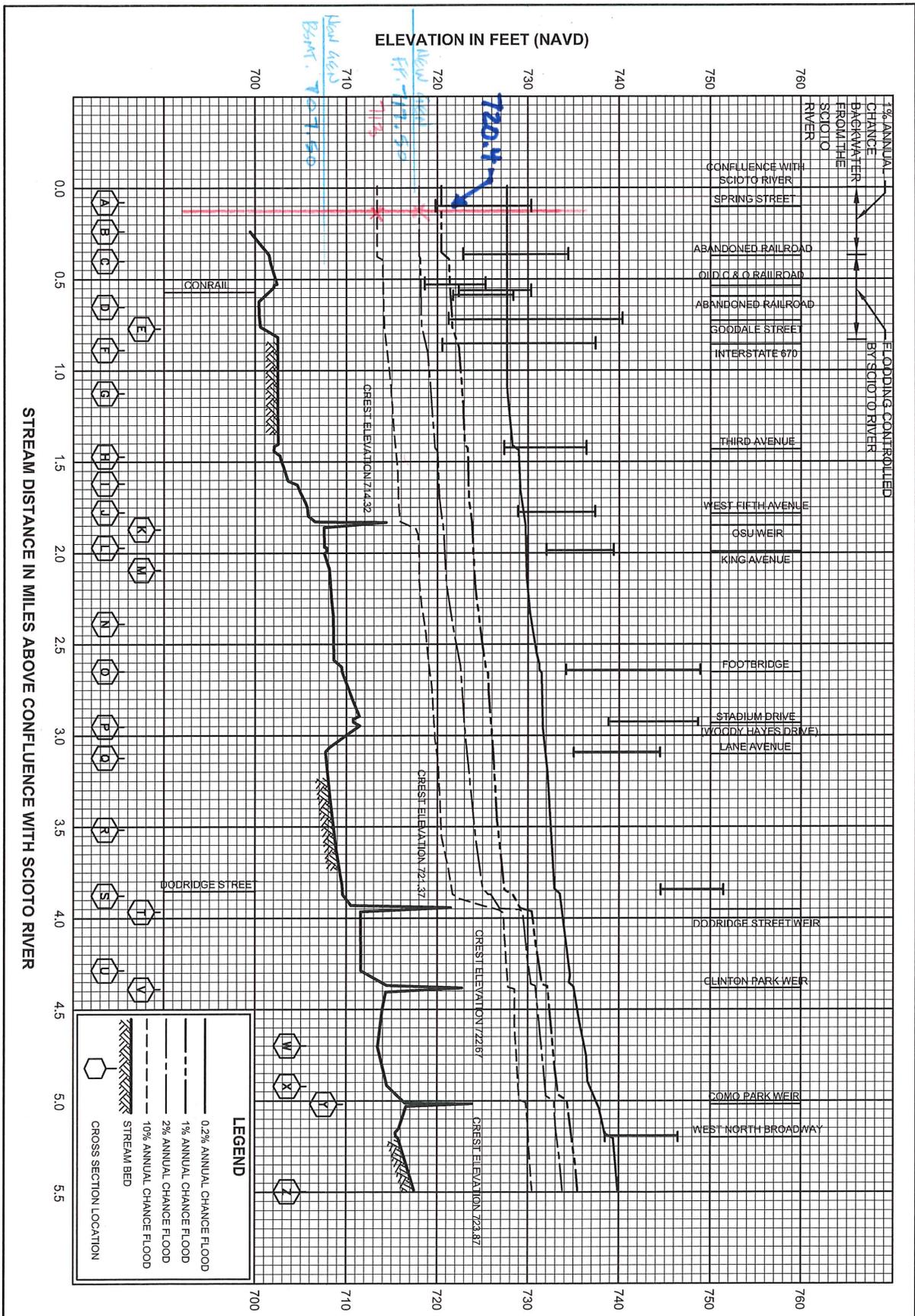
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This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The base map shown complies with FEMA's base map accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **4/9/2018 at 5:02:25 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: base map imagery; flood zone labels; legend; scale bar; map creation date; community identifiers; FIRM panel number; and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

FIGURE 1



1





3



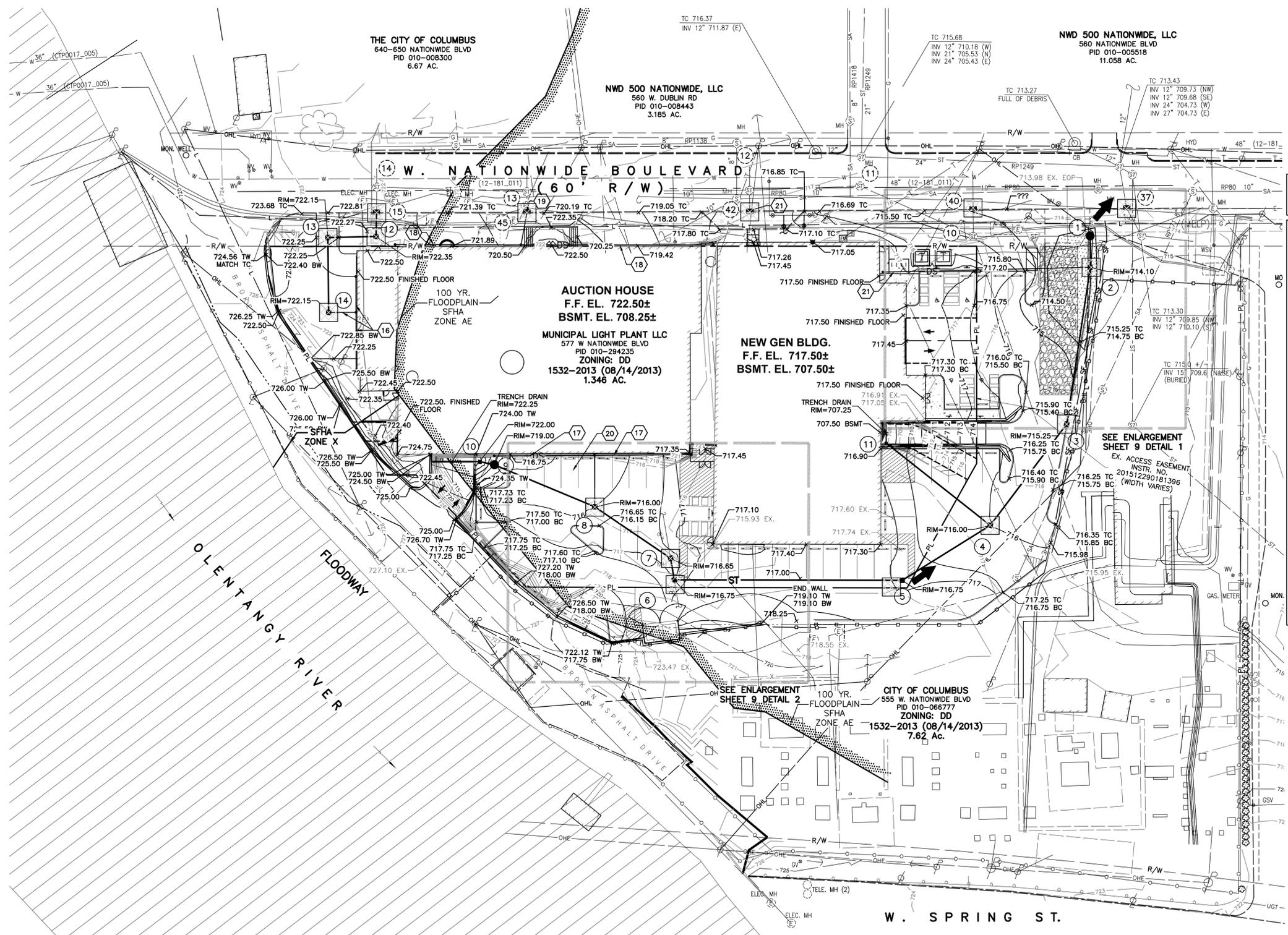












KEYED NOTES

- 17 PROPOSED 8" DOWNSPOUT AT 1.00% MIN
- 18 PROPOSED 12" DOWNSPOUT AT 1.00% MIN
- 19 DIRECT TAP EX. CURB INLET 45 (E-3083 PLAN BY OTHERS) WITH 12" DOWNSPOUT DRAIN @ INV. ELEV. 718.00
- 20 10" DOWNSPOUT DRAIN @ 1.00% MIN
- 21 6" DOWNSPOUT DRAIN PIPE @ 2.0% MIN.

NOTE
EXISTING STORM STRUCTURES 9 THROUGH 45 ALONG NATIONWIDE BOULEVARD ARE PER E-3083 PLAN (BY OTHERS)

NOTE FOR MASS GRADING PLANS NOT GOING TO FEMA
UPON COMPLETION OF THE FILL IN CONJUNCTION WITH THIS MASS GRADING PLAN, AN APPLICATION FOR A LETTER OF MAP REVISION (LOMR) WILL NOT BE SUBMITTED TO THE FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA), THUS ANY FUTURE SUBMITTAL TO FEMA WILL FIRST REQUIRE A NEW GRADE AND FILL PLAN WITH PROOF AS THE FILL USED AND PROPER PLACEMENT, INCLUDING COMPACTION WITHIN THE DESIGNATED FILL AREA WILL BE ELEVATED AND/OR DRY FLOOD PROOFED IN ACCORDANCE WITH THE REQUIREMENTS OF THE C.C. CHAPTER 1150, FLOODPLAIN MANAGEMENT COLUMBUS WATER, SEWER AND ELECTRICITY CODE.
FILLING MAY BE ALLOWED IN THE FLOODWAY FRINGE ONLY IF ASSOCIATED WITH A GRADE AND FILL PLAN. THE GRADE AND FILL PLAN SHALL BE FULLY DETAILED AND SUBMITTED AS PART OF AN APPLICATION FOR A CERTIFICATE OF ZONING CLEARANCE. FILL SHALL NOT BE PLACED UNTIL AFTER THE CERTIFICATE OF ZONING CLEARANCE HAS BEEN ISSUED FOR GRADING AND FILLING.
REGARDLESS OF ANY DETERMINATION ISSUED BY FEMA TO REMOVE AN AREA FILLED AS PERMITTED AND APPROVED FROM THE DESIGNATED SPECIAL FLOOD HAZARD AREA (SFHA), DEVELOPMENT WITHIN THAT AREA OF FILL SHALL BE CONSTRUCTED WITH THE LOWEST FLOOR LEVEL, EXCLUDING A BASEMENT OR CRAWL SPACE, AT OR ABOVE THE FLOOD PROTECTION ELEVATION.
THE LOWEST GRADE ADJACENT TO A BUILDING OR STRUCTURE TO BE CONSTRUCTED WITHIN THE DESIGNATED FILL AREA SHALL BE AT OR ABOVE THE FLOOD PROTECTION ELEVATION, WITH THAT GRADE ELEVATION TO EXTEND AT LEAST TWENTY (20) FEET FROM THE PROPOSED BUILDING TOWARDS THE FLOODWAY OR FLOODING SOURCE.
IN ADDITION, A RESIDENTIAL DWELLING WITHIN THE DESIGNATED FILL AREA MUST HAVE A MEANS OF INGRESS AND EGRESS AT OR ABOVE THE BASE FLOOD ELEVATION THAT EXTENDS CONTINUOUSLY FROM THE DWELLING TO A LOCATION OUTSIDE THE SPECIAL FLOOD HAZARD AREA WITHIN THE SUBJECTED SITE.
REASONABLY SAFE FROM FLOODING
ALL STRUCTURES ASSOCIATED WITH FUTURE DEVELOPMENT WITHIN THE AREA OF THE FLOODPLAIN FILL SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE STANDARD OF BEING "REASONABLY SAFE FROM FLOODING", AS OUTLINED IN TECHNICAL BULLETIN 10-01, DATED MAY 2001, PUBLISHED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) OR SUCCESSOR DOCUMENTS.

LEGEND

- EX. FIRE HYDRANT
- EX. PULL BOX
- EX. TREE
- EX. CATCH BASIN
- EX. SANITARY MANHOLE
- EX. STORM MANHOLE
- EX. STORM CURB INLET
- EX. UTILITY POLE
- EX. LIGHT POLE
- EX. GAS SERVICE VALVE
- EX. UNDERGROUND TELEPHONE PEDESTAL
- EX. WATER SERVICE VALVE
- EX. SIGN
- EX. FENCE
- EX. WATER LINE
- EX. WATER SERVICE
- EX. UNDERGROUND TELEPHONE
- EX. GAS
- EX. STORM
- EX. SANITARY
- EX. UNDERGROUND ELECTRIC
- EX. OVERHEAD ELECTRIC
- PROP. FIRE DEPARTMENT CONNECTION
- PROP. STORM MANHOLE
- PROP. STORM CURB INLET
- PROP. STORM CATCH BASIN
- PROP. STORM TRENCH DRAIN
- PROP. SANITARY CLEANOUT
- PROP. WATER SERVICE VALVE
- PROP. SIGN
- PROP. FENCE
- PROP. FIRE SERVICE
- PROP. WATER SERVICE
- PROP. STORM SEWER
- INLET PROTECTION
- PROP. FLOOD ROUTE
- PROP. SPOT ELEVATION
- EX. CONTOUR (1 FOOT INTERVAL)
- STABILIZED CONSTRUCTION ENTRANCE (PER STD DWG 2230)
- CONCRETE WASHOUT AREA
- PROP. SILT FENCE
- EXISTING STORM STRUCTURE NUMBER PER E-3083 PLAN
- FLOODWAY
- LIMIT OF SFHA ZONE AE

SCALE: 1" = 30'

EASEMENT REFERENCE			REVISIONS			
CITY NO.	COUNTY RECORDER VOL.	PAGE	GRANTOR	NO.	DESCRIPTION	APPROVAL/DATE

PLAN PREPARED BY:		
 E. P. FERRIS ASSOCIATES <small>Consulting Civil Engineers and Surveyors</small>		

EROSION AND SEDIMENT CONTROL/GRADING PLAN

PROJECT TITLE:			
PRIVATE STORM SEWER AND DETENTION FOR COLUMBUS MUNICIPAL LIGHT PLANT 577 W. NATIONWIDE BLVD.			
DIVISION USE ONLY		OWNER	
		CONTRACTOR	
		INSPECTOR	
AGREEMENT	COMPLETED		
RPD	CKD	CLD	CON. DR.

CITY OF COLUMBUS DEPARTMENT OF PUBLIC UTILITIES DIVISION OF SEWERAGE AND DRAINAGE DIVISION USE ONLY	
SCALE: 1" = 30'	SHEET: 7/12
CONTRACT DRAWING NO. CC-18117	RECORD PLAN NO.