

October 15, 2019

Matthew E. Ferris, P.E., P.S.  
President  
E. P. Ferris & Associates, Inc.  
880 King Avenue  
Columbus, Ohio 43212

RE: Stormwater Drainage Manual (SWDM) Type II Variance Request –  
Marble Cliff Quarry Development and Quarry Trails Metro Park

Mr. Ferris:

This letter is in response to the subject variance request to the SWDM Section 3.1 – General Criteria. More specifically, in accordance with SWDM Section 3.1 stormwater control facilities shall not be located within the designated Federal Emergency Management Agency (FEMA) floodplain boundaries. A variance is requested to allow some of the required water quality volume to be placed within the existing quarry ponds, located within the FEMA 100-year floodplain due to the proposed Marble Cliff Quarry Development and Quarry Trails Metro Park Development needs and site limitations.

The request was submitted to the City on August 29, 2019. The Variance Review Committee met and reviewed the subject Variance Request on September 11, 2019.

As part of the Variance review process, the subject Variance request was posted on the City website on September 4, 2019 to solicit public comments. By the extended due date of September 25, 2019, comments were received from the Central Ohio Watershed Council and from Friends of the Ravines. As the comments were not directly related to the applicant's compliance with the SWDM requirements, the commenters were suggested to communicate directly with the development team.

The submitted Variance Request was found by the Variance Review Committee to be in compliance with the SWDM Non-Stream Protection Type II Variance Application requirements.

Two alternatives were considered within the application for the requested Section 3.1 variance - Full Compliance and the Preferred Alternative.

Under the Full Compliance Alternative underground Stormtech chambers would be provided for storage of the 0.90-in. rainfall volume tributary to Scioto River and the ponds from the Wagenbrenner development site and the Metro Parks site, fulfilling the requirements of the Ohio EPA Construction General Permit and the Columbus Stormwater Drainage Manual. This will require 23,000 cu. ft. of additional underground Stormtech chamber storage vs. the Preferred Alternative, including 3,000 cu. ft. within the Rule 13 boundary.

Under the Preferred Alternative, the project would fully comply with the Ohio EPA Construction General Permit post-construction stormwater quality BMP requirements as well as with the Columbus SWDM water quality volume requirements; however; a portion of the required water quality volume would be



located within the proposed Quarry Trails Metro Park ponds, located within the FEMA 100-year floodplain, thus necessitating a SWDM variance. Specifically, the project would provide full storage volume for a 0.90-inch rainfall for the portion of the site tributary to Scioto River outside of the floodplain; however, only 0.75-inch water quality rainfall volume storage for the private development portion of the site tributary to Roberts Millikin Ditch would be located in the underground Stormtech chambers outside of the floodplain, with the remaining 0.15-inch water quality rainfall volume storage located within the ponds. Additionally, the entire 0.90-inch rainfall volume from the Metro Parks portion of the site will be treated in the ponds.

The Preferred Alternative would reduce placement of underground stormwater storage chambers within the Rule 13 (capped trash landfill) boundaries, thus reducing the possibility of groundwater contamination. The majority of the Quarry Trails Metro Park parcel is located within the 100-year floodplain. There is no sufficient space within this parcel outside of the 100-year floodplain, Roberts Millikin Ditch SCPZ, and steeply-graded areas to provide the SWDM-compliant stormwater quality controls without negatively impacting the proposed recreational amenities of the park. The Metro Parks consultant researched the available water quality storage within the ponds, and determined that ample storage is available for the Preferred Alternative. To further enhance the proposed stormwater runoff quality treatment under the Preferred Alternative, vegetated greenways and pervious pavement sections are also proposed to be utilized.

Upon reviewing and discussing the application submitted by the applicant, the Variance Review Committee agreed with the applicant that the Preferred Alternatives represents the development team's good faith effort to comply with the SWDM stormwater quality controls requirements to the maximum practical extent.

In light of the above, the subject Variance Request (Type II SWDM Section 3.1), Preferred Alternatives is conditionally approved contingent upon the following stipulation:

- Storm CC-Plans and Stormwater Management Reports for Marble Cliff Quarry and Quarry Trails Metro Park to be submitted and approved by the City of Columbus.

No approval contained herein relieves or absolves the applicant of any provisions of applicable state or federal laws. Please contact Plan Review Section Manager Greg Fedner, P.E. at 614-645-8072 with any questions.

Sincerely,



John G. Newsome, P.E., Administrator  
Division of Sewerage and Drainage

pc: Variance Review Committee  
File