

	Public comments received by the City in response to the 04/13/22 and 06/14/22 original and revised variance postings have been separated into groups based on the type of comment and the response, and the groups colorized alternating no color and grey color to provide more clarity. A single response has been provided to address the shared concern for each such grouped set of comments.		
	COMMENT	RESPONSE	ORGANIZATION
1	Please explain the double black line used for the top of bank in the stream restoration plans. My concern is about slope and bank stability since the meanders extend to the first black line. A cross sectional drawing with elevations will help explain the potential erosion issues.	The Applicant has been asked to address.	
2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
3	There is no site (building/road/parking lot) layout for the Preferred Alternative Development Plan. This needs to be included in the application.		
4	Why are sod and Kentucky Bluegrass/perennial rye grass seeds being planted in the SCPZ? There are plenty of native grasses and ground covers (many of which have root systems that go 3-15'—yes, that's feet—into the soil, helping to hold the soil in place and making the plants drought tolerant) that would increase the diversity and health of the stream/riparian corridor ecosystem. The grasses specified on this Details sheet have roots that penetrate the soil no more than six inches at best.		
5	c. Maps should show the direction of the stream flow.		
6	e. Why does the stream mitigation middle reach on Page 46 have the largest width?		
7	i. With over 200 acres of undeveloped space after the 8 warehouses are added, it is not clear why the streams and existing natural areas need to be impacted. Better Maps and more justification are needed to understand the project.		
8	4. Please explain the double black line used for the top of bank in the stream restoration plans. My concern is about slope and bank stability since the meanders extend to the first black line.		
9	Please explain how running streams through “encapsulated stream channels” (pipes) and creating a uniform zig-zag (pinking shears-style) stream “meanders” pattern reflects “...allowing for a natural stream channel design to be implemented with native vegetation plantings, natural meanders,...” (see cover letter)		
10	6. Appendix D Preferred Alternative Plan- does not provide a layout of the proposed development; it only provides stream relocation plans. Building Plans are needed to understand why 72 inch culverts are proposed instead of stream relocation.		
11	7. The Erosion and Sediment Control Plan Overview (EC3.0) does not show the appropriate detail.		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
12	Appendix D: Preferred Alternative Development Plan does not provide locations of buildings/parking lots/roads (footprints) or tree lines; it only provides stream relocation plans. Building, utility, and other hard surface footprints are needed to understand why streams need to be relocated and 72" culverts are proposed instead of stream relocation. (The footprints and tree lines are depicted in cAppendix B and C maps.)		
13	Please clarify why so many relocated piped sections are needed. Utility, sewer, and other easements are mentioned. Do these require it and if so, why? The restoration area of the SCPZ provided should not include piped areas. The multiple segments of stream reach being created is concerning.		
14	What is a "temporary diversion station," how temporary are they, and why are they being used in multiple locations on site? What happens once they are no longer "temporary?"		
15	Contour lines with elevations (900', 902', etc.) associated with the stream restoration need to be depicted on the maps in Appendix D so steepness of slopes in the streams' proximity can be easily discerned. Perhaps grading plans can be provided that would give a more holistic image of what is planned to happen to the site.		
16	Stream flow arrows are nonexistent on the Appendix D and EC drawings and should be noted		
17	I think restoring the stream is a positive but I don't understand why there's a long section of culvert in between restored stream portions. I think it should be continuous. If someone wants to put in a road, build a bridge over the stream.		
18	I am requesting one map that shows the development and the mitigation on one page! Also missing is information about how the stream will interact with all the stormwater detention needed for this development. Can you please send the Preferred Plan (pg 43) as soon as possible? With over 200 acres of undeveloped space after the 8 warehouses are added, it is not clear why the streams and existing natural areas need to be impacted. Better maps and more justification are needed to understand the project.		
19	Is it allowable to the Columbus Stormwater Drainage Manual that the Minimal Degradation Design and the No-Impact Design are the same? This approach has not been acceptable to the Ohio EPA for their Non Degradation Assessment unless the project is water dependent (like a Marina).		
20	Can you please provide the acreage of the SCPZ that is actually floodplain? The concern is that the stream will not have enough floodplain for water quality. Can the floodplain width be expanded and the upland width decreased? The best streams have 10 times the stream width to allow them to move over time.		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
21	Vernal Pool restoration- Is this the triangular wetland area that looks like a stormwater basin in the headwaters to Stream 11(EC 7.0)? More detail is requested about the small central rectangular polygon area and what is proposed to be planted there. Also more information is requested about the seed for this wetland restoration? Roundstone Mix 163 is the Northern Retention Basin Mix? Based on a review of the include species it does not seem appropriate for a wooded wetland. Also the Roundstone Mix 167 Northern Riparian Buffer Mix is proposed for an upland wooded wetland. What is the expected timeline to create a wooded wetland from Seed?		
22	The revised application continues to be deficient, which does not allow for adequate review of the Preferred Alternative Design and the "need" to have a stream restoration design that puts more than 1,200 LF of culvert in its design.		
23	Better maps/layouts and additional justification (including but not limited to why the streams and existing natural areas need to be impacted) are needed to understand the project. A map detailing the Conservation Easement location/width/length, etc. is necessary to better understand what is being proposed; the text on page 20 is vague in discussing this.		
24	Examples of cross sections for proposed stream channel, upland planting elevations, and E&S blankets need to be provided.		
25	EC5.0 – EC5.3 - The applicant should consider substituting keystone trees for many of the replacement cottonwood. Also, adding understory plants (shrubs, perennials, and native grasses) will provide ecosystem balance to the reforestation efforts. The link to lists of keystone plants for this region is available on the National Wildlife Federation website at: https://www.nwf.org/-/media/Documents/PDFs/Garden-for-Wildlife/Keystone-Plants/NWF-GFW-keystone-plant-list-ecoregion-8-eastern-temperate-forests.ashx?la=en&hash=1E180E2E5F2B06EB9ADF28882353B3BC7B3B247D		
26	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
27	Is there a site layout for "Preferred Alternative Development Plan?"		

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28	The applicant has also utilized the tired tropes of "increased crime, unpermitted use" we hear from every developer that presents "hardships." Further, there is an inconsistency in the presumed economic benefits from the variance vs. the "No Impact" scenario. On page 17, the applicant notes their preferred plan "is anticipated to result in the creation of approximately 100 more temporary jobs and 300 more permanent jobs." Yet in Appendix A, these figures are reversed. The project will only net 100 more permanent jobs via the preferred plan vs. "No Impact." Additionally, these permanent jobs are barely minimum wage positions given the cited figures. Given the lack of affordable housing options, it should be noted the difficulty of attaining the supposed "social benefit" of housing noted on page 12 with these types of associated jobs. The economic "hardships" underpinning this request need closer scrutiny.		FAR WEST SIDE AREA COMMITTEE (FWSAC)
29	I think restoring the stream is a positive but I don't understand why there's a long section of culvert in between restored stream portions. I think it should be continuous. If someone wants to put in a road, build a bridge over the stream.		
30	Is there a site layout for "Preferred Alternative Development Plan?"		
31	As a home owner near the proposed development of the Buckeye Rail Development, I am concerned over the loss of trees that will result in our area. Please address this issue as it comes to your purview.	Tree impacts within the existing Stream Corridor Protection Zones will be mitigated in accordance with the SWDM requirements. Tree impacts outside of the Stream Corridor Protection Zones cannot be addressed within the SWDM variance approval process. Suggest contacting the Applicant for an answer.	
32	The Columbus Urban Forestry Master Plan probably makes a good coffee table display, or a door stop, or fire kindling, but it certainly isn't being used to implement an Urban Forestry Master Plan. Xebec, the developer of what is now known as the Buckeye Rail Yard, has plans to cut down 400 trees. The vision dreamed up by whoever wasted their time putting together an Urban Forest Master Plan for Columbus says we must grow our tree canopy for our health. And yet, every time a developer comes before the zoning committee they are given carte blanche to do whatever makes them the most money. Why, this developer is even planning on filling in ponds and wetlands. In return, they will pay you money for offsets. How will Columbus reach their vision of a 40% tree canopy if you let one developer cut down 400 trees in one fell swoop?		
33	The Columbus Urban Forestry Master Plan says on page 84 that "The most significant finding of the comprehensive review of Columbus' ordinances and policies is that the City does not have adequate tree protection and preservation regulations on private property - which is unusual for a midwestern city." So when is Columbus planning on addressing this insufficiency? After just one more developer has his way with us? There is no one to tell them no; there is no one to enforce any reasonable guidelines.		

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34	The West Scioto Area Commission's Planning Committee put out principles regarding development in the area. Item C was to "Preserve or increase the amount of tree canopy and green space. . ." The developers, though, don't care about area commission policies. They go over the commissions' heads knowing that downtown, sitting on the Urban Forestry Master Plan booklet to make them taller, they will have officials eager to give them whatever their bottom line wants. Cutting down 400 trees, filling in ponds and wetlands, moving stream beds, and receiving tax abatements is very destructive to our community's physical and financial environment.		
35	Save the trees at the Buckeye Rail Site! The city cannot call itself tree-friendly when it is not meeting its own established tree canopy metrics. I live in this area and with new apartments and houses built, we are losing many trees, seeing an increase in wildlife in our back yards, and have noticed the trees are not being replaced.		
36	I am strongly opposed to the plan to remove some 500 trees so that we can have a big ugly warehouse! We have so many abandoned businesses and buildings, there is not one decent reason to build another. How does this help climate change? Stop appeasing developers and do your job to protect the interests of citizens and our very fragile water and air. You can still have meaningful business development without destruction.		
37	I'm a homeowner in Scioto Woods on the west side. I understand you are cutting down 600 trees and filling in wetlands. I'm writing to request you deny the variance as it will adversely affect our neighborhood and climate. Wetlands are critical for our environment and wildlife. We are already living with way too much industry and concrete along with the noise. The destruction of what little trees we have is not justified. This will all displace the wildlife we enjoy as they need space for the food in wetlands and trees. I thought Columbus cared about the environment. This variance does not support that belief. Let them build their warehouse elsewhere. I'm tired of commerce supplanting the needs of regular people trying to enjoy what little part of the planet we've been able to purchase for our own peace of mind.		
38	I wish to express my concern over the removal of nearly 500 trees and the moving of a stream bed to accommodate more warehouses for a developer. A storm water variance should not be granted. Our water resources must be protected, and our stormwater management here in Columbus is critical. Columbus was one of the first cities in the country to develop storm water management & reservoir systems. Let us not forget that legacy. We need to remain leaders in conservation. Let us also be true to our recently adopted Climate Action Plan. Water is a key category.		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
39	Sacrificing a large quantity of trees and altering the hydrology simply to build more warehouses should not be permitted. Please listen to your community.		
40	I am writing to comment on the looming environmental disaster proposed by the new owner of the former Buckeye Rail Yard. The core of concern is the owner's request for a Storm Water Variance that would remove over 450 mature trees and bury a long existent stream and associated wetlands. The owner proposes to replace the trees with essentially twigs and essentially pay for the privilege or destroying the wetlands.		
41	This already heavily industrialized area needs the softening of that tree and wetlands buffer. A nearby adjacent housing development and even the bordering commercial and industrial enterprises benefit from this much needed green space. Removing it will add to the harshness and noise of the area.		
42	The Far West Side Area Commission already has a dismally low tree canopy of only 12% and the West Scioto Area Commission is which is immediately adjacent is only 21% and is rapidly declining due to massive multiunit apartment complexes built and planned since the survey was completed. Planting saplings is simply not a sufficient remediation. Any benefit would take decades to even approximate the benefit of the existing canopy. It is even less likely there would ever be a satisfactory replacement of the wetlands.		
43	Preserving the wooded corridor along the western edge of the property allows for the addition of a north-south multiuse path or perhaps allow for vehicle access for future developments in the area. Once removed and replaced with additional warehouses, those options are lost.		
44	please let the new developer know that the trees must stay! They need to stay to help offset all the exhaust from the exhaust of the trucks. We are adding more warehouse so then we need to add more trees. In fact I would have loved to see a new park with trails instead of more warehouses. But so not going to happen so the they should have to plant more trees! Please make them plant more trees and add to them! Thank you.		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
45	<p>As a resident of two different communities in the Trabue Road area for the past twelve years, I have seen enough change and development and am begging you to slow down the destruction of even more green space. Your proposal means 500 more trees will be destroyed. We are already deficient in our "Tree Canopy Percentage" and this is definitely heading in the wrong direction. Where is the wildlife going to go?</p> <p>The people who live around here are proud of our community and do not want to be inundated with more industrial buildings and warehouses. Even the new Metropark is largely filled with housing instead of PARK. We lost the beautiful property on the corner of Trabue and Wilson to apartments. New apartments on the corner of McKinley and Trabue, New apartments on Hague, new apartments on Trabue near 270, new apartments across from Walmart, and on and on. All this in the 12 years that I have lived in the area. Where has the wildlife gone?</p> <p>Even the Hilltop's Tree Canopy Percentage is higher than ours!</p> <p>If you cannot work around the stream, then leave it alone! Where will the wildlife go?</p> <p>I don't want to live in an industrial community. One of the main reasons I love my neighborhood is the mature trees. Don't ruin it!</p>		
46	<p>Please accept the following comments regarding the development of the Buckeye Rail Yard.</p> <p>While there are economic benefits to be gained from the development of the former site of the Buckeye Rail Yard, I am GREATLY concerned with the proposed destruction of the 50-acres of woods, the wetlands and pond. Based on information pulled from the recently approved Columbus Urban Forestry Master plan, the city's current tree canopy cover is 22%, and the theoretical maximum potential tree canopy is 63%, Columbus has currently achieved only 35% of what is possible. Removing these existing trees at the former Buckeye Rail Yard area, which is one of the lowest areas at just 12% coverage, will not help in preserving or advancing the tree canopy cover.</p> <p>I understand that Columbus doesn't currently have an urban forest management plan, however, please don't let that prevent the City from preserving the existing tree canopy located in the Buckeye Rail Yard.</p>		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
47	<p>Also of major concern to me, is this parcel currently contains a Stream Protection Corridor Zone, and the developers have applied for a stormwater variance to move the stream and fill in two wetlands and a pond present on the site. The loss of these areas would further entail destruction of the current wooded area with a significantly reduced canopy replacement, which will take decades to fully mature.</p> <p>To achieve high levels of health, quality tree canopy is critical for Columbus to remain a livable city. It is especially important as stressors increase as the climate warms and high population growth is expected. As you know, tree canopy significantly reduces heat stress and air pollution, which has significant impacts on public health. In order to make real gains in canopy cover, the sources of tree loss must be addressed and losing 50 acres isn't helping to accomplish the goals to prioritize, preserve and grow the tree canopy in Columbus, equitably across neighborhoods, to improve health and quality of life for all residents.</p> <p>I sincerely hope everyone can work together with the developer to find an equitable solution that preserves the woods, wetlands and pond.</p>		
48	<p>I am writing with regard to the proposed Buckeye Railyard development on the West side of Columbus. The developer appears to be Buckeye XO. LLC, of Dallas Texas a non-Ohio entity. Their development plans include a large deforestation and stream relocation effort. The overall plans are for development of land which is bordered by Trabue Rd on the South, Roberts Road, on the North, Interstate 270 on the East and Walcott Road on the West. While the area is now a defunct railroad yard, it does offer an area for development of some sort, housing, warehouses, or some other commercial venture.</p> <p>Development of that type need not simply involve a 'scorched earth' approach to achieve success or the lowest cost. In fact, paying attention to some land preservation for forestation and preservation of extant river beds can lead to a more attractive project which in turn can attract a higher per square foot lease or sale price. That sort of an approach can be a win-win situation for the developer and the nearby residents of the development.</p>		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
49	I strongly object to the Variance Request as presented. My major objection concerns the existing 50-year old "Urban Forest" and wetlands located parallel the proposed sites western property line in the northwest quadrant of the site, adjacent to parcels owned by Roberts Dearborn Industrial, LLC., containing two streams and wetlands. The existing urban forest strip of concern is approximately 500 feet wide and 2,800 feet long. [see attachments.] Background 01. It is understood applicants desire to develop as much enclosed building area and vehicle maneuvering areas for warehousing and distribution purposes ("Large-Scale Industrial Logistics Warehouse") as they will be permitted. It is understood the applicant has financial means to pay for site designs their consultants have generated. It is also understood the applicant can still develop over three million square feet of building area and accompanying pavement areas if the north western portion of the site containing 50-year old trees is not disturbed. The applicant can still develop a significant portion of the site and generate positive fiscal revenues if a majority of the existing urban forest, stream corridor segments, and wetlands are left undisturbed.		
50	02. The fact the engineering consultant refers to the existing 50-acre urban forest as "unmaintained woods" is actually a positive attribute and not detrimental to the natural systems, including wildlife, that presently live and reproduce in the urban forest.		
51	It is understood applicants desire to develop as much enclosed building area and vehicle maneuvering areas for warehousing and distribution purposes ("Large-Scale Industrial Logistics Warehouse") as they will be permitted. It is understood the applicant has financial means to pay for site designs their consultants have generated. It is also understood the applicant can still develop over three million square feet of building area and accompanying pavement areas if the north western portion of the site containing 50-year old trees is not disturbed. The applicant can still develop a significant portion of the site and generate positive fiscal revenues if a majority of the existing urban forest, stream corridor segments, and wetlands are left undisturbed.		
52	The fact the engineering consultant refers to the existing 50-acre urban forest as "unmaintained woods" is actually a positive attribute and not detrimental to the natural systems, including wildlife, that presently live and reproduce in the urban forest.		
53	The majority of wildlife that currently reside in the urban forest will be killed if trees are clear cut as the applicant has proposed. Mammals, birds, and aquatic animals that currently reside in the urban forest won't benefit from a "Forested Wetland Mitigation Bank Credit."		

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54	Replacement trees would take 50 years to mature and provide similar benefits of providing oxygen, filtering air, shading pavements, and providing wildlife habitat that currently exist.		
55	By retaining the existing Urban Forest including streams and wetlands, an existing "softscape" area will remain continuing favorable conditions for rainwater percolation into the ground and recharge of the regional water table. Less stormwater run-off from the overall site will need mitigated.		
56	The existing developed property west of the applicants property currently contains warehouses and excessive area of paved surfaces with minimal landscaping (Roberts Dearborn Industrial, LLC.) The Buckeye Rail Yard property western Urban Forest currently mitigates the heat island affect of the existing neighboring property, too. 50-acre tree removal and stream relocation would not only increase the heat island effect of the Buckeye Rail Yard property but also of the neighboring property.		
57	Trees capture carbon from the atmosphere. Assuming the developer employs typical building construction techniques including concrete foundations, concrete slabs, and cast concrete walls (for upwards of 4 million square feet of buildings) the existing 50-year old urban forest, allowed to remain, can initially offset some of the carbon generated by constructing the buildings and pavements and subsequently sequester carbon generated by a transportation intense business.		
58	It would be irrational and extremely brutal for the State of Ohio, Franklin County, and the City of Columbus to permit the applicant to destroy 50-ares of existing, mature trees and replace them with smaller quantities and sizes of trees, especially when the City of Columbus promotes itself as "Sustainable Columbus."		
59	It would be irrational and extremely brutal to permit the applicant to destroy a treed area with wetlands approximately 500 feet wide containing 480 trees and replace it with small plantings in a new stream corridor that is typically 100-125 feet wide and will appear as earthwork remnants from World War One trench warfare.		
60	The City of Columbus, proud Arbor Day member, "Tree City USA" designate, retained arborist consultants for generation of an "Urban Forestry Master Plan" (UFMP) over the course of multiple years educating citizens about the benefits of maintaining and planting trees, hosted public meetings including "hundreds of stakeholders," and generally promotes increasing tree canopies within City limits to foster better public health. Permitting clear-cutting of the 50-acre treed area would be a mockery of the City of Columbus's Urban Forestry Master Plan efforts and be an embarrassment to the Columbus Mayor and City Council members.		

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61	Relocation of streams, removal of wetlands and removal of 50-year old existing trees at the western property line [backing up to the existing, adjacent, warehouse site (Roberts Dearborn Industrial, LLC) extending from the common "Newyo LLC property pin (recommended southern limit of construction) northward, to the property/R-O-W line at Roberts Road] shall NOT be permitted. Stream Corridors 9 and 10 in the vicinity shall NOT be altered. Proposed Stream Relocation10 (aka "Stream B") and Stream Relocation 09, (3) detention basins, and driveways and parking lots shall NOT be permitted in the same existing Urban Forest zone. Buildings 2A, 2B MUST BE REDUCED IN SIZE assuming driveway circulation and parking are necessary to remain on the west side of the proposed buildings.		
62	I am writing to express my opposition to some of the requests being made in the Buckeye Yard development project. Namely, the stormwater variance, which would move the stream and fill in two wetlands and a pond, as well as the catastrophic destruction of the currently wooded area. Although I understand that this project would bring certain economic advantages to the area, I am equally convinced that the requests to move streams, alter or destroy wetlands, and the decimation of a sizeable portion of our already inadequate tree canopy is simply too high a price to pay. As a city, we should be focusing on more things than just economic development. If too much attention is given to economic development at the expense of livability or the natural environment, then we are failing as a community. It is not the responsibility of the city to give a blank check to developers to make sure they make the maximum amount of money. Furthermore, this proposed plan seems to be devoid of details about how these proposed changes would impact the environment, those who are downstream from this development, what steps would be taken to mitigate any possible contamination from the creosote-treated railroad ties, what the size or viability of the replacement trees will be, or what the time frame would be for these items to be completed. To be completely clear, I oppose anything that would involve the moving of the stream, the destruction of the wetlands and the pond, and the removal of the trees. Thank you.		
63	I oppose clear-cutting 500 very mature trees and destroying a large habitat. I'd like them to explore a path for the stream or a construction plan that combines preserving mature trees with planting new. For example, the Clover Groft stream restoration 2-3 miles west of this site was accomplished while preserving many/most mature trees. I appreciated the diversity of trees on the replacement list.		
64	I just learned that warehouses are planned for the abandoned Buckeye Rail Yard. And that wetlands, stream, and trees will be destroyed. This destruction is not acceptable to me. The developer needs to find ways to build with nature, not destroy it. Trees, in particular, provide oxygen for the public and reduce urban heat gain, and must be preserved.		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
65	The variance request proposed for redevelopment of this site is in direct contradiction to our City's stated goals. This site contains approximately 50 acres of vital tree canopy coverage, much of which surrounds the current SPCZ and adjacent wetlands and pond. The City of Columbus is already tree deficient with only 22% coverage citywide, however, our Far West Side is well below that average with an abysmal 12% average. Ours is one of the worst areas in the entire City, therefore, it is vital that we preserve as many trees as possible in order to achieve the City's stated goal of "Citywide Tree Canopy Cover of 40%." (https://www.columbusufmp.org/tree-canopy-overall.html)		FAR WEST SIDE AREA COMMITTEE (FWSAC)
66	Given the City's stated goals with respect to tree canopy and the inconsistencies noted here and by others, we cannot support this variance request in its present form. We respectfully request the City work with the applicant to explore innovative solutions for: <ul style="list-style-type: none"> • Preservation of the existing tree canopy • Protection/Restoration of existing streams, wetlands, and pond • Maximization of remaining site area to achieve economic goals 		FAR WEST SIDE AREA COMMITTEE (FWSAC)
67	I am submitting public comment regarding a storm water variance requested for the Buckeye Rail Yard Redevelopment (4882 Trabue Road). I live in Scioto Woods, and I oppose this variance request that includes the destruction of 50-acres of woods, movement of a stream, and filling in of two wetlands and pond. The City of Columbus has multiple programs (that I appreciate!) that hold the goal of making Columbus more green. This requested variance would go against our shared goals by decreasing our already lacking tree canopy and destroying habitat for wildlife.		
68	Columbus has seen unprecedented growth, and it appears that this will continue for the foreseeable future. However, unprecedented does not have to be unplanned or ill-planned. The destruction of hundreds of trees for the sake of warehouses in an area that already is under-treed and over-warehoused is ill-planning that will take decades to recover from.		

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69	I am not opposed to redeveloping the rail yard.I am adamantly opposed to the removal of yet more canopy.Our area has lost considerable green space over the last 15 -20 years.I have seen a dramatic drop off in wildlife, especially pollinators over the last ten years. Years ago I specifically planted milkweed for the monarch butterflies as they were pretty common. I have seen none in the last few years. The decline in honeybees has been alarming. I now see few if any. The list goes on. The stream has already been significantly degraded. This proposal will pretty much turn it into a lifeless polluted sewer. The railyard can be developed without removing additional canopy. The developers and operators will still make quite a profit. Yes they may not be able to make as much, but what is the cost of turning the entire area into a grey lifeless industrial zone? At some point the needs of the residents should matter to the zoning board. We have been routinely ignored. I can only surmise that the zoning board members just doesn't give a damn about us.		
70	The far west side has less tree canopy than other areas of Columbus, this is presented in the data, is fact and can't be disputed.		
71	All over Central Ohio, especially areas in Franklin, Delaware, Madison and soon Licking County are losing more and more acreage of woods, farmland and other natural green space. This is permanent loss, it can never be recovered and returned to the woods, farmland or green space.Please keep unaltered and protect the wetlands, woods, streams and other natural areas within the proposed redevelopment of the Buckeye Yards. The benefits to the far west side extends beyond the actual site and includes the Big Darby watershed, Franklin County, and Ohio.		
72	Tree canopy preservation is a top priority within the Far West Side and information regarding plans to preserve nearly 50 acres are vital. Also, the so-called economic "benefit" underpinning this request still shows inconsistencies and is lacking.		FAR WEST SIDE AREA COMMITTEE (FWSAC)
73	I just learned that warehouses are planned for the abandoned Buckeye Rail Yard. And that wetlands, stream, and trees will be destroyed. This destruction is not acceptable to me. The developer needs to find ways to build with nature, not destroy it. Trees, in particular, provide oxygen for the public and reduce urban heat gain, and must be preserved.		
74	Are there any public tree impacts in the ROW? If so, how will they be addressed?		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
75	<p>Please accept the following comments and questions about the Buckeye Rail Yard Re development (Scioto Watershed) Type III Stormwater Variance Application.</p> <p>GENERAL</p> <p>The three development plans listed in the Table of Contents do not match the plan names listed in the appendices. In fact, the Minimal plan is not listed as such in the Table of Contents at all. Attention to detail and consistency are extremely important in documents such as these.</p> <p>Impacts on aquatic, terrestrial, and avian life in the stream relocation/"encapsulating" and tree removal areas must receive careful consideration in a project of this magnitude.</p> <p>Applicant needs to state the approximate length of time it will take</p> <p>1) to complete these and</p> <p>2) for wildlife to repopulate these areas.</p> <p>Questions and concerns abound about the information contained in the Variance Application.</p> <p>With more than 200 acres left undeveloped after the eight warehouses are added, it is unclear why the streams and existing natural areas need to be impacted. Better maps and more justification are needed to understand the project. Until all questions and concerns are addressed satisfactorily and in full, I recommend the City go with the No Impact Development Plan.</p> <p>Without the correct calculations, complete maps, complete information, and responsive explanations, the other two alternatives cannot be reasonably/fully assessed.</p> <p><u>Please let me know if you have any questions or concerns</u></p>		
76	While the economic benefits are encouraging for the proposed warehouses at the former Buckeye Rail Yard, the Far West Side Area Commission is right to be concerned with the disposition of the ~50-acres of woods on the western side of the property. The Far West Side is significantly lacking in tree canopy coverage. In fact, it is one of the lowest areas at 12% coverage within the City of Columbus. Removing almost 500 trees is a huge concern - it would take years to replace those, and I doubt replacing them is part of the developer's plan. Finding a compromise that would not have a large environmental impact should be a higher priority than acquiescing to corporate wishes.		
77	Was the SCPZ Reforestation plan updated (in this revised application) to reflect the SCPZ width revisions? Were the trees planned to be cut near Stream 13 added to the Restoration plan? How long will it take for the 2-3" caliper trees in the Reforestation plan to replace the same amount of tree canopy planned to be removed? With more trees planned to be planted than removed, what will the resulting tree canopy area be at maturity?		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
78	Sometimes quoting another persons well written plea to void the Buckeye Rail Yard Stormwater Variance is worth repeating. The City of Columbus talks of being a Good Steward through the Columbus Urban Forestry Master Plan and Columbus Watershed Management Program is this just talk and no action or selected action? (Commenter copied and pasted another comment, verbatim)		
79	As a whole, CRPD is strongly opposed to the extensive loss of mature tree canopy associated with the Buckeye Rail Yard development, both that within the SCPZ as well as the coverage not subject to SWDM variance committee jurisdiction, and we note that this development is contrary to the goals of the Urban Forestry Master Plan.	The Columbus Urban Forestry Master Plan recognizes that 70% of Columbus' trees grow on private property, and stopping net canopy loss through tree preservation on private property is a key action toward meeting our citywide canopy goals. While Columbus currently lacks citywide tree protection on private property and cannot therefore enforce preservation or mitigation in this project, we urge the developer to voluntarily preserve large, healthy trees in their project. Trees provide critical benefits to our residents, and the neighborhood surrounding the development already experiences below-average canopy. The hundreds of trees proposed to be removed in this project are filtering out air pollution, absorbing stormwater, producing shade, and serving as habitat for wildlife. We cannot reach our canopy goals unless we partner as a community around our trees, and we request that preservation and protection of existing trees be a consideration in this project.	Columbus Recreation and Parks Department (CRPD)
80	The following statement is in the Variance Application: "This tree inventory and associated mitigation has been conducted in accordance with the City of Columbus Executive Order 2015-01 and coordination with Columbus Recreation & Parks Dept." The way I read this indicates they worked with CR&P on the inventory and associated mitigation. Is that correct? Nothing was coordinated with me. Would you please explain why CR&P no longer deals with the mitigation of the SCPZ? Per the City's Attorney's Office. CRPD authority is only on City property and R/W. The SCPZ is a conservation easement on public land. All mitigation is handled by the Department of Sewers & Drains.		
81	Please verify whether the site is being privately redeveloped. If it is, CR&P won't be working with this project at all and the Tree Ordinance is for public development/redevelopment. If this is a private redevelopment, why does the following statement appear in the application, "This tree inventory and associated mitigation has been conducted in accordance with the City of Columbus Executive Order 2015-01 and coordination with Columbus Recreation & Parks Dept."?		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
82	<p>The Columbus Urban Forestry Master Plan has zero credibility with developers, and zero enforcement by city officials. The Buckeye Rail Yard has plans to cut down 400 trees, making a mockery of the Urban Forestry Master Plan.</p> <p>The West Scioto Area Commission's Planning Committee is in the process of approving a development off Trabue Rd by Mapleway Dr. that will substitute parking and apartments for small businesses, while cutting down a large stand of trees.</p> <p>The Columbus Urban Forestry Master Plan says that "The most significant finding of the comprehensive review of Columbus' ordinances and policies is that the City does not have adequate tree protection and preservation regulations on private property - which is unusual for a midwestern city."</p> <p>The developers do not care a whit about the Columbus Urban Forestry Master Plan, and the local associations are powerless to do anything to get developers to comply with the Urban Forestry Master Plan.</p> <p>Under the current lack of compliance and the lack of willingness of enforcement, Columbus will never realize the goal of a 40% tree canopy. I support a Forestry Master Plan. It is very disheartening to see the Plan treated as nothing more than a nuisance.</p>		
83	<p>I am aware of the Columbus Urban Forestry Master Plan for increasing the tree canopy throughout all parts of the city. Please see the introductory paragraph below, taken verbatim, for your recent report for 2021 on the progress that has been made to date.</p> <p>About the Urban Forestry Master Plan</p> <p>"The Columbus Urban Forestry Master Plan (UFMP) is the first Citywide, strategic plan to invest long-term in Columbus' trees. Approved by Columbus City Council in April 2021, the UFMP will guide the entire Columbus community to prioritize, preserve and grow our tree canopy. We have three tree canopy goals: 1.) Reach Citywide Tree Canopy Cover of 40% by 2050, 2.) Stop the Net Canopy Losses by 2030 and 3.) Invest in Equitable Canopy Across All Neighborhoods by 2030. We will accomplish these goals through four strategies: community coordination and collaboration, best practices, dedicated resources and stronger policies. This report details the progress made to date on these four strategy areas."</p>		
84	<p>Given that the plans for the Railyard development call for clearcutting the current trees on the property and in addition to redirecting the natural flow of the existing water way, it appears to me that the proposed effort by the developers is in total contradiction to the Urban Forestry Master Plan. In addition, development is currently underway on Trabue Ave of the new Quarry Trails Metro park which is in close proximity of the Railyard development proposal, approximately 3-4 kilometers (~2.4 miles).</p> <p>According to the Urban Forestry Master Plan, that area of the city is has one of the lowest areas of tree canopy density. The Metro Park development will help improve that deficiency, but it will of little use if the development of the Rail Yard proceeds as currently planned.</p>		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
85	<p>In short, I strongly request that you review the plans with the developer and require them to revise their plans regarding forestation issues as well as deny the rerouting of the stream. Under the new plans the new stream (drainage ditch) will feed into the stream at the nearby Raymond public golf course before transiting through the new Metro Park to the Scioto River, degrading the ecological health of the river banks along, the way and thereby degrading property values of the homes that will be down stream of that industrial runoff. As my home is on the Scioto River, in the Marble Cliff Crossing development, I and my neighbors may well suffer losses in property values. I appreciate your evaluation of the development of the Rail Yard while paying close attention to the Urban Forestry Master Plan, and the potential adverse effects on nearby property values and the potential degradation of the new Quarry Trails Metro Park due to air pollution from the commercial development and the pollution of the waterways. As the US Corps of Engineers has expanded the flood plain assessment area of the Scioto River south of Trabue Avenue, I would also suggest you require a detailed assessment from the developer as to the effect of replacing a natural stream with what amounts to a drainage ditch. The potential developer has stated in the materials submitted to your office for review that they are awaiting the input from the USA Core of Engineers. No decision should be made until that report is in hand and provided for community review.</p> <p>The entire development as planned seems to be one in serious need of reevaluation. It fails in many respects to meet the overall Urban Forestry Master Plan. I believe a better plan can be developed that could allow for commercial use without being antithetical to the forestry improvement that the city has made a high priority. My neighbors and I are depending on you to heed the concerns of the tax paying citizens of this West side area.</p>		
86	Last year, two separate plans were produced by our City to address the impacts of climate change: the Columbus Urban Forestry Master Plan (Spring 2021) and the Columbus Climate Action Plan (December 2021). In both reports, the necessity of preserving, restoring, and increasing the tree canopy cover was highlighted as an important tool in addressing the challenges of climate change. The benefits include not only sequestration of CO2, shade to cool urban heat zones, natural noise buffers, "greenway corridors for wildlife," but also includes the reduction in "stormwater impacts from severe weather events." As noted by Councilmember Elizabeth Brown, "...the Urban Forestry Master Plan, which this council passed a resolution in support of, and that plan establishes three goals: to reach a citywide tree canopy cover of 40% by 2050, to stop net tree canopy losses by 2030, and to invest in equitable tree canopy across all neighborhoods." (Emphasis added)		FAR WEST SIDE AREA COMMITTEE (FWSAC)

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
87	The No-Impact and Minimal Impact drawings continue to mislocate part of the Streamline 11. This was commented on in response to the original variance application and need to be corrected. Also, why is the development footprint the same for the No-Impact and Minimal Impact drawings? Does the Columbus SWDM allow this when Ohio EPA would find this unacceptable for its Non Degradation Assessment for this type of use?	The proposals are not the same; the text accompanying them explains the differences that are not actually shown. The Applicant has been asked to provide appropriate graphics on the Exhibits to clarify.	
88	Is it permissible that the Minimal Degradation Design and the No-Impact Design are the same?		
89	Please verify whether the site is being privately redeveloped. If it is, CR&P won't be working with this project at all and the Tree Ordinance is for public development/redevelopment. If this is a private redevelopment, why does the following statement appear in the application, "This tree inventory and associated mitigation has been conducted in accordance with the City of Columbus Executive Order 2015-01 and coordination with Columbus Recreation & Parks Dept."?	The site is privately owned and privately redeveloped. The Executive Order 2015-01 is only applicable to public projects which are publicly funded.	Columbus Recreation and Parks Department (CRPD)
90	9. Curious about the proposed cleanup of the site from creosote treated rail road ties that may have leached into the soil. Phytoremediation using native grasses (Little Bluestem, Big Bluestem, Switch Grass and Indian Grass) will be protective of downstream users. Is any remediation being done?	Suggest contacting the Applicant for an answer	
91	And the plan to disrupt the fresh water stream? Horrible. There is already a stream in Scioto Woods (Newell Drive entrance) that has its own issues of standing water, overgrowth, bacteria, and litter. With a relocation planned, am I going to have to clean a stream in addition to my own property? Will there be a lack of flow with increased standing water producing more mosquitos? Will my dog become sick from water bacteria or will I fall ill from a mosquito bite? My tax money needs to work for me and my neighborhood (street lights and sidewalks would be nice) not for companies looking to increase profits at the expense of the environment.		
92	One last comment. A development project must make money to be successful. But - and this is a BIG BUT - no community or government entity has the obligation to maximize a developer's return on investment. That developers make money is important, but how much money they make is and should never be our concern or obligation.		
93	The ever-growing traffic problem on the Renner/Trabue/McKinley Roads Corridor is well known. CCC recently approved a massive expenditure to move the RTMC Mobility Study to Phase 2. The massive warehouse project, even before expanding into the wooded west side of it, will by any reasonable prediction add significant truck traffic to that congestion. If profitability of this project is contingent on raping the wooded buffer, then it shouldn't have been started. No expansion of this project should be allowed until that study is complete.		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
94	Will there be any cleanup of the site from creosote treated rail road ties that may have leached into the soil. Phytoremediation using native grasses (Little Bluestem, Big Bluestem, Switch Grass and Indian Grass) will be protective of downstream users. Is any remediation being done?		
95	It appears the Site owner's purchase of the property "for a substantial fee" did not include consideration of environmental impacts but rather approaches development of the Site as a "Manifest Destiny." This approach to development places the almighty dollar above the environment, leaving us all poorer. Being a good environmental steward should be considered an obligation.		
96	There is no mention of addressing the effects climate change will have on storm events and drought. Has this even been considered and planned for? If so, it needs to be included in the application. If not, why not?		
97	There is no mention of site soil analysis or remediation in this application. Given the previous use of this site, it could well be a brownfield site. Have any soil analyses been conducted, especially in the areas most likely to be contaminated by creosote-treated railroad ties? If so, what are the results of the soil analyses?		
98	Since this site was a railroad yard (for decades) that had lots of creosote rail road ties – what cleanup is the Applicant proposing to do?		
99	It is stated that "Discharges from this activity, if approved, would result in degradation to, or lowering of, the water quality of Roberts Millikin Ditch." How is this going to be addressed?		
100	Is any remediation planned? Does this include cleanup of the site from creosote-treated railroad ties that may have leached into the soil? I urge you to employ phytoremediation (using native grasses like Little Bluestem, Big Bluestem, Switch Grass and Indian Grass) as it will be protective of downstream users.		
101	I would suggest partnering with Metro Parks, Nature Conservancy, Darby Creek Association or other environmental organizations and apply for Clean Ohio Funds to help preserve and protect this area.		
102	Based on comments from the Corps (page 150 of the Variance Application_Final_6-14-22) it states that "the large amount of proposed tree clearing relative to the available habitat in the immediately surrounding area may result in indirect adverse effects to the Indiana bat. The USFWS recommended a summer survey be conducted to determine the presence or absence of Indiana bats within the project area". What are the results of the survey?		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
103	The variance request proposed for redevelopment of this site is in direct contradiction to our City's stated goals. This site contains approximately 50 acres of vital tree canopy coverage, much of which surrounds the current SPCZ and adjacent wetlands and pond. The City of Columbus is already tree deficient with only 22% coverage citywide, however, our Far West Side is well below that average with an abysmal 12% average. Ours is one of the worst areas in the entire City, therefore, it is vital that we preserve as many trees as possible in order to achieve the City's stated goal of "Citywide Tree Canopy Cover of 40%." (https://www.columbusufmp.org/tree-canopy-overall.html)		FAR WEST SIDE AREA COMMITTEE (FWSAC)
104	The Upper Shoreline Planting Area per page 73 is 11.56 acres of the SCPZ and is deficient in identifying what will be planted. Please provide detail. The interest is in seeing native and diverse plantings.	Will work with the Developer to provide appropriate details during the plan preparation/review process.	
105	Page 85- What species are proposed for the live staking areas? Again, looking for native diversity.		
106	Has the stream designer determined what the flows will be for the restoration stream reaches? The concern is for the proposed riffle areas and that the flow may be insufficient to make these areas functional.		
107	The inclusion of non woven geotextile fabric (EC 6.2) around the wood debris /vane structures is of concern. Since it is not biodegradable, will it end of as stream litter? Why does the applicant propose to wrap the wood? Please request that natural biodegradable materials be used.		
108	For this extensive redevelopment will the utilities on site need to be relocated? If so, they should be placed to not interfere with the stream.		
109	Regarding tree replacement species, is it possible to get some of the cottonwoods replaced with oaks and other species to increase the diversity in the stream corridor/conservation easement?		
110	Will balled and burlapped trees be planted in the new stream floodplain (as shown on EC4.4) as part of the 12.43 acre reforestation plan? If not, please explain the size of the planting materials.		
111	The Planting Plan on page 73 (EC3.5) provides no detail regarding what will be planted in the Upper Shoreline Planting area (11.58 AC). Please provide this detail.		
112	The Details drawings on page 85 (EC6.1) show only "willow" being used as live stakes. What species of willow will be used? As diversity is extremely important in nature, the applicant needs to add other tree genus/species (i.e., Red Osier Dogwood, etc.) to create much needed native diversity. Monocultures are too easily affected by disease and insects.		
113	On page 73 states that there are 11.56 acres which is part of the SCPZ but it doesn't identify what will be planted. Given that the proposed tree clearing will obviously have adverse effects on the wetlands and ponds are you able to provide any detail as to what plantings are proposed?		

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
114	<p>8. The stream relocation appears to be a 2 stage rock lined channel. Once the correct sewersheds (drainage areas) are calculated with the appropriate Stream Corridor Protect Zone widths, it would be more effective to create a self forming channel natural design. Please see https://engineering.purdue.edu/watersheds/webinars/WLA2011/DitchDesign/Self-forming%20streams%20PURDUE_mecklenburg.pdf</p> <p>https://ohiowatersheds.osu.edu/resources/stream-systems/two-stage-ditch-symposium/self-forming-streams</p> <p>This self forming channel approach is cost effective, allows for sediment deposition, denitrification, and lush vegetation development which increases the Manning's Number for the stream corridor and slows down the water and traps more sediment. Since there is so much open space on site (undeveloped area) allowing for 10 times the channel width will provide</p>	The City has requested the Applicant to provide their reasoning for the proposed stream relocation method vs. the self-forming channel natural design. Additionally, several comments addressing the geometry of the proposed stream channel, riffles and pools placement etc. have been provided to the Applicant with the request to address, some as part of the variance process, and some during the plan preparation process.	
115	The stream relocations appear to be 2-stage, rock-lined channels. After the correct sewersheds (drainage areas) are calculated with the appropriate SCPZ widths, it would be more effective (costs, sediment deposition, denitrification, and vegetation development) to create a self-forming channel design. Information about self-forming channel design is available online.		
116	<p>The stream relocation appears to be a 2 stage rock lined channel. Once the correct sewersheds (drainage areas) are calculated with the appropriate Stream Corridor Protect Zone widths, it would be more effective to create a self forming channel natural design. Please see https://engineering.purdue.edu/watersheds/webinars/WLA2011/DitchDesign/Self-forming%20streams%20PURDUE_mecklenburg.pdf</p> <p>https://ohiowatersheds.osu.edu/resources/stream-systems/two-stage-ditch-symposium/self-forming-streams</p> <p>This self forming channel approach is cost effective, allows for sediment deposition, denitrification, and lush vegetation development which increases the Manning's Number for the stream corridor and slows down the water and traps more sediment. Since there is so much open space on site (undeveloped area) allowing for 10 times the channel width will provide long term benefits. The stream will create its own benches and meanders.</p>		
117	Given the heavily engineered stream banks, there will be no natural stream meanders on this site. Again, the applicant should use a self-forming channel natural design and allow the stream to find its way through the SCPZ, which should be wide enough to accommodate this (10 times the stream width); the applicant would save tons of money on the engineering and installation (so it wouldn't be such a financial hardship).		

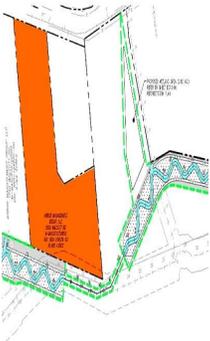
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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
118	As stated in my previous comments regarding the original variance application, the proposed stream restoration results in streams that look as though they've been created by pinking shears. No natural stream looks like what is depicted in the drawings. This most unnatural design results in the over-calculation of the # of linear feet of stream that replace the existing streams, making the applicant look good for adding so much more stream length. The stream design should be done using a self-forming channel natural design and the estimated linear feet recalculated. (This was also indicated in my previous comments.)		
119	What will the flows for the restoration stream reaches be? The proposed riffles need adequate stream flow to be functional.		
120	Also, the addition of more warehouses in this specific area will make an already bad traffic situation much worse. Unless major inlets/outlets are created, the volume of these new business will all feed onto Roberts Rd. to get to 270. This area is already heavily congested/backed-up at commute times as laden trucks are very slow to cross intersections - often meaning only a handful of vehicles can cross each stop-light change.	Traffic issues cannot be addressed through the SWDM Variance and the SWDM plan review process. Suggest contacting the Applicant for an answer	
121	There are few methods to enter or cross 270 from the Far West Side, and this will make things significantly worse. The increased idle-time will add to pollution will compound the reduction of trees.		
122	.How will stormwater drain from hard surfaces (roofs, parking lots, roads, etc.) to the streams? How will pollutants associated with these surfaces be mitigated/kept from entering the streams? Does the calculated amount of stormwater from these surfaces account for the increased storm events/duration resulting from climate change?	Water quality requirements of the Columbus SWDM and Ohio EPA Construction General Permit will be strictly adhered to during the plan preparation/review process.	
123	How has overland (nonpoint source) stormwater flow been accounted for? Are there riparian areas/slopes adjacent to the streams designed to buffer nonpoint source runoff? What are the specs on the riparian buffers?		
124	What is sraw (EC6.3)? Why is sod needed for the Stream Corridor Protection Zone? Sod is typically a non-native with shallow roots.	sraw = straw (typo); the Seeding Chart on EC6.3 seems generic; not every item is to be used (within the SCPZ) Will work with the Developer to provide appropriate details during the plan preparation/review process.	
125	EC6.3 – Is "SRAW" in the table for the Erosion Control Blanket supposed to be "STRAW"? If so, the drawing needs to be corrected. Please indicate what the "Excelsior" erosion & sediment control blanket material is. It should be biodegradable. If it isn't, the applicant should specify a biodegradable version.		
126	a. StreamStats is not accurate for the tributaries to the Scioto River in this area. The applicant needs to calculate the sewer shed for the stream network that flows north of the yard (Stream 10 and 9) and to calculate the entire drainage area for the stream network upstream of Roberts Rd that drains south to Barbee Ditch by calculating the drainage area at Trabue Rd for Streams # 11 and 12. This is important for calculating the appropriate Stream Corridor Protection zone width for the mitigated streams.	The applicant was provided information on the mapped sewersheds for use in recalculating drainage areas. The revised submittal has addressed the issue.	

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
127	b. There are lots of stream drawings in the package but they seem repetitive. It would be helpful to have actual scaled cross sectional drawings. My concern is that due to the lack of accurate drainage areas that the mitigated streams will be functional ditches (deep and narrow). The stream widths should be designed based on revised sewershed drainage areas. Also these streams will have to include the runoff from all the new stormwater basins. The stream drainage areas should include all of the stormwater basin drainage areas.	The numbering of the Exhibits within the package will be requested to be changed, as different exhibits have the same numbers within various Appendices. The applicant will be required to provide detailed scaled cross-sections during the plan preparation process.	
128	d. Please provide clarification of why so many relocated piped sections are needed. Mention is made of utility, sewer and other easements. Does the elevation of the utilities require it? The restoration area of the SCPZ provided should not include piped areas. The concern is about the multiple segments of stream reach being created.	Utility conflicts drove the design in areas. At least one piped section was eliminated with the resubmittal. The applicant will be asked to justify the need for the proposed piped sections along the relocated streams.	
129	e. Why does the stream mitigation middle reach on Page 46 have the largest width?	The Applicant will be asked to review floodplain requirements/needs.	
130	f. Has the applicant determined that there will be sufficient flow to maintain functional riffles? If not, these bmp's may be expensive but non-functional.	The Applicant has been asked to review the pool/riffle sequence design as well as floodplain width, curve radii, and other relocated stream design features to assure functionality and health of the relocated streams.	
131	g. There are 7,162 ft of stream on site to be replaced with 7,193 ft of stream and 1,573 ft of pipe. All relocated stream should be open and provide floodplain! Putting in meanders to increase stream length is somewhat misleading.	The City provided instruction to the applicant on how mitigation lengths are to be measured.	
132	h. Maps EC2.0 and EC2.1 have a legend for the limit of trees to be removed but because Stream Stats did not calculate the correct drainage area the SCPZ widths and the limits of tree removal are incorrect. Please recreate these drawings.	Has been addressed with the resubmitted variance	
133	2. Why is the Buckeye XO parcel information unavailable on the Franklin County Auditors Website?	Suggest contacting the Applicant and/or the Franklin County Auditor's Office for an answer	
134	3. For this extensive redevelopment will the utilities on site need to be relocated? If so, they should be placed to not interfere with the stream.	Most utility lines required for this redevelopment are new, and have been proposed to reduce the impact to the proposed stream locations (piped sections). We continue working with the Applicant to minimize piped sections of the relocated streams.	
135	5. Will balled and burlapped trees be planted in the new stream floodplain (as shown on EC4.4) as part of the 12.43 acre reforestation plan? If not, please explain the size of the planting materials.	The updated reforestation area is 15.22 Acres. We have requested the Applicant to clarify the proposed planting plan. Some of the relevant information will be provided during the plan preparation phase of the project.	
136	Wanted to confirm the deadline for comments on the Buckeye Rain Yard variance request. The request was posted 4/13/2022. The 14 day window would close on 4/27/2022 - is that end of business day (5:00pm) or midnight (11:59pm)? We are trying to quickly digest the 230 page report and accompanying documents, educate our community, provide feedback in the allotted time, and ensure any responses are submitted in a timely fashion.	Members of public wishing to comment on the proposed variance application but unable to complete their comments by the posted deadline may request an extension.	FAR WEST SIDE AREA COMMITTEE (FWSAC)

	COMMENT	RESPONSE	ORGANIZATION
1	Please explain the double black line used for the top of bank in the stream restoration plans. My concern is about slope and bank stability since the meanders extend to the first black line. A cross sectional drawing with elevations will help explain the potential erosion issues.	The Applicant has been asked to address.	
2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
137	Scaled, cross-sectional drawings are needed, especially given the lack of accurate drainage areas. The mitigated streams will end up being functional ditches (deep and narrow). Given the proposed significant increase in hard surfaces on the site, stream widths need to be designed based on revised sewershed drainage areas. These streams will have to include the runoff from all the new stormwater basins. The stream drainage areas need to include all the stormwater basin drainage areas.	While it may not be sufficiently clear in the application, management of stormwater internal to the site is kept separate from the stream mitigation that is routed around the perimeter. Cross sections of the proposed (relocated) streams will be requested to be provided as part of the construction plan preparation process.	
138	If the utilities on site need to be relocated, they should be placed so there is no interference with the streams.	As part of the plan review process, the City intends to make sure that such interferences, i.e. crossings/conflicts, are minimized.	
139	Appropriate detail is missing in the Erosion and Sediment Control Plan Overview (EC3.0).	Some additional information has been provided with the resubmittal.	
140	Part 2 Comments RE: Buckeye Rail Yard Redevelopment Type III Stormwater Variance Application Please accept the following comments and questions about the Buckeye Rail Yard Re development (Scioto Watershed) Type III Stormwater Variance Application. EXISTING STREAMS On the Appendix B and C maps, where a bright green line with arrowheads is superimposed on a photographic image of the southern end of the property, the green line "existing stream" appears to depart from the normal tree-lined channel west of the Prop Detention Basin and cut across two square areas, each with a circle in the center, then back toward the tree-line channel until it goes back into its proper location near Stream 12. When viewing a satellite image from Google Earth of this property, it is obvious the maps in question have incorrectly located that section of Stream 11. Is this a case of "it's close enough"? Which begs the question, what else is "close enough"? Too much is incorrect, unexplained, and missing from this application to grant any variance at this time. The applicant must address the document issues and resubmit the application. Please let me know if you have any questions or	Appendix B and C maps have been revised; green lines removed. Additional revisions have also been made to clarify the Exhibits.	
141	I disagree with filling in wetlands in one place and trading it for somewhere else. The west side of Columbus from 270 west to Hilliard-Rome Rd and from Roberts Rd south to I 70 is almost a complete desert of concrete and warehouses and apartments and shopping centers. I think Columbus should take the opportunity to make this site different.	The City intends to make sure that the appropriate wetlands requirements of the SWDM have been met. The City also requires that OEPA/ACOE wetlands impact/mitigation requirements have also been addressed.	
142	I whole heartily applaud and support the efforts to redevelop a significant portion of the Buckeye Rail yards. Keeping and redeveloping existing industrial and commercial areas is the smart thing to do, thank you. Too many times the easy and less expensive way is to build out new buildings for industrial, commercial and residential uses, scraping off the green earth and put in permanent roof top, black top and concrete.	Thank you for your comment!	

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.																														
143	It still seems like some information is missing about the need for the Stream Corridor Protection Zone impacts. I am concerned about the cutting of some much mature tree canopy along streams, wetlands and ponds and the proposed rock lined stream channels and limited reforestation. It seems like it is woefully inadequate for the pending climate changes of wetter springs and hotter, dryer summers to be protective of our Water quality.	<p>from the Stream Reforestation Plan: "In addition to replacement of [691] Trees within the SCPZ, additional bare root plantings are anticipated to be conducted to ensure that at the end of USACE/OEPA monitoring requirements, the SCPZ exhibits at least 400 native woody plants per acre, of which at least 200 are tree species."</p> <p>*The 661 value in this note needs revised to 691. Tree impacts within the existing Stream Corridor Protection Zones will be mitigated in accordance with the SWDM requirements. Tree impacts outside of the Stream Corridor Protection Zones cannot be addressed within the SWDM variance approval process. Suggest contacting the Applicant for an answer.</p>																													
144	The revised application is still deficient to allow adequate review of the Preferred Alternative Design and the need for over 1,200 linear feet of culvert in the stream restoration design and in a Stream Corridor Protection Zone. Why are 72 inch culverts proposed instead of stream relocation? The concept in allowing a developer to move a stream for their convenience should result in a relocated stream free of development infrastructure. The concern is that so many segments of culverts throughout the site end up fragmenting the natural stream habitat. Appendix D did not show the layout of the preferred alternative design plan and the stream restoration.	The existing corridor of the southern stream is fragmented by culverts and tracks. We will work with the Applicant during the plan review process to minimize such new relocated stream fragmentation.																													
145	Stream Corridor Protection Zone widths have been recalculated for the actual drainage basin size using Columbus Sewershed data. Thanks. However, I found various Drainage Area sizes in the documents. To be clear the correct SCPZ widths are shown on Sheet EC3.5 for a total SCPZ area of 20.478 ac. More detail is also needed to show a map of the actual Conservation Easement since the language was vague about the easement being interrupted by sanitary, storm sewer and access easements. Again the concern is about fragmentation of habitat.	The values in the table on Sheet EC3.5 are consistent with those listed on page 11 of the pdf file.																													
146	<p>The SCPZ Reforestation plan is dated 3/28/22 (before the SCPZ width revisions) and will need to be updated for the accurate widths shown below and for the total stream impacts (including stream 13 = 7,412 lf). Were the trees that need to be cut around Stream 13 added to the Reforestation Plan? The total number should increase above the 489 trees to be cut and the 691 trees for mitigation. The total of the widths and lengths from this chart adds up to 22.13 acres not 20.478. Please verify.</p> <table border="1" data-bbox="233 1243 743 1373"> <thead> <tr> <th colspan="4">EXISTING STREAM TABLE</th> </tr> <tr> <th>STREAM</th> <th>TRIBUTARY AREA (MI²)</th> <th>SCPZ WIDTH (FT)</th> <th>STREAM LENGTH (FT)</th> </tr> </thead> <tbody> <tr> <td>A (EX 11)</td> <td>0.45</td> <td>109</td> <td>81510</td> </tr> <tr> <td>A (EX 11 + EX 12)</td> <td>0.75</td> <td>132</td> <td>81113</td> </tr> <tr> <td>A (EX 11 + EX 12 + EX 13)</td> <td>0.99</td> <td>146</td> <td>82473</td> </tr> <tr> <td>B (EX 10)</td> <td>0.40</td> <td>104</td> <td>82211</td> </tr> <tr> <td>B (EX 10+ EX 8)</td> <td>0.97</td> <td>145</td> <td>8424</td> </tr> </tbody> </table> <p>NOTE: STREAM CORRIDOR PROTECTION ZONE WIDTHS HAVE BEEN ADJUSTED AT POINTS OF STREAM CONFLUENCE TO ACCOUNT FOR COMBINED FLOWS.</p> <p>PROPOSED STREAM CORRIDOR PROTECTION AREA (±20.478 AC.)</p>	EXISTING STREAM TABLE				STREAM	TRIBUTARY AREA (MI ²)	SCPZ WIDTH (FT)	STREAM LENGTH (FT)	A (EX 11)	0.45	109	81510	A (EX 11 + EX 12)	0.75	132	81113	A (EX 11 + EX 12 + EX 13)	0.99	146	82473	B (EX 10)	0.40	104	82211	B (EX 10+ EX 8)	0.97	145	8424	The reforestation plan was revised with the new submittal, and is date June 13, 2022. A total of 691 (30 additional) repalcement plantings are now proposed.	
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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
147	The stream relocation plans still do not show examples of cross sections for the stream channel, E&S blankets and upland planting elevations. Again the concern is for meanders that are close to the edges of steep uplands. Will the Erosion and Sediment Control Blankets be biodegradable? Otherwise it is just adding plastic litter to the environment.	The SDDM SCPZ delineation process, as detailed in ODNR's Rainwater and Land Development Manual, will be followed. Have asked the Applicant to look at the ESCB biodegradable option.	
148	The original Maps EC2.0 and EC2.1 had a legend for the limit of trees to be removed but because Stream Stats did not calculate the correct drainage area the SCPZ widths and the limits of tree removal were incorrect. These should be redrawn and the tree assessment for removal be updated to be in compliance?	The Exhibits and descriptions will be updated with the next resubmittal.	
149	EC2.0 & EC2.1 – The revised application pages 48 & 49 no longer contain the "Limits of Trees to be Removed" in the Legend (which appear in the original application). Corrected layouts/maps need to include the corrected limits of trees to be removed along with corrected SCPZ widths.	The numbering of the Exhibits is misleading; different exhibits have the same numbers. For example, EC2.0 exists in the Stream Relocation Plans (Appendix E) and also in the SCPZ Reforestation Plans (Appendix F) The Applicant has been asked to address.	
150	I request the City of Columbus disapprove the revised application and/or request the applicant submit the noted deficient/revised information in a revised variance application. I am concerned about the adverse effects on water quality given the excessive cutting of mature tree canopy along streams, wetlands, and ponds. The severely engineered stream channels and limited reforestation are also concerning.	The City has provided its comments to the Applicant and requested the Applicant to address them. The new, revised Application submittal is expected.	
151	The applicant should provide the floodplain acreage in the SCPZ. If needed, the floodplain width can be expanded and the upland width reduced to accommodate this.	The city addresses floodplain capacity by requiring compensatory storage for any fill placed within the floodplain. Also, as part of the stream relocation, SCPZ requirements will be enforced.	
152	Kimley-Horn recently identified and delineated one potentially regulated aquatic resource (Stream 13) which was not previously identified or delineated during in the original delineation report so this relocation will most certainly disrupt additional unidentified aquatic and animal resources.	The City staff have performed office and field investigation to identify all streams and other features required to be protected by the SWDM.	
153	There is a lot involved in developing this site and I would respectfully request the City and Developer address & remediate the questions/concerns being put forth by the public before moving forward. I would like to avoid most proposed impacts to jurisdictional waters of the United States and their associated SCPZ areas, while attempting to still fulfill most of the overall project purpose and need.	The City will assure compliance with the requirements of the SWDM, and will take all public comments into consideration while working with the developer during the variance review as well as plan preparation processes.	
154	As they have stated "smaller warehouse structures could potentially be developed and placed on the Site to avoid the majority of impacts within the existing SCPZ (thus maintaining compliance with the SWDM)".	The Applicant is endeavoring to demonstrate as part of the Variance request that such concepts would not achieve the desired functionality and economics of the development, hence the variance request.	
155	Despite not having been notified as requested in our previous communication, we learned the Buckeye Yard developers have submitted revised documentation for their variance application. Our objection to this request remains as the issues raised in our prior comments have not been addressed. (Copy attached) SEE ITEMS 82 - 86 TO REFERENCE THE PREVIOUS COMMENTS	Please see responses to previous comments	

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2	The applicant needs to combine the proposed site layout/development and the mitigation on one map/layout. It's too easy to miss something important when flipping between multiple maps/layouts.		
156	<p>Additional to our previous concerns, this revision proposes the creation of a new wetland area to supplant the destruction of the two current wetlands. The location proposed is approximately 300' from the approved asphalt plant at parcel 560-154579. What impacts will the noise and pollutants have on the development of this forced wetland project? The current wetland areas are located over 3,000' from the anticipated neighboring asphalt plant, within an established tree canopy, thus providing some mitigation from the plant's impact. These areas should remain undisturbed or targeted for proper restoration efforts vs. creation of a new ecosystem subject to additional environmental stressors.</p> 	Regarding noise and pollutants, the existing wetlands are currently located in a very industrial setting, with a long history of commercial, transportation, and rail activity in close proximity. The mitigation wetland will be located in a similar, industrial setting and likely subject to similar noise levels. Both existing and proposed locations are generally exposed to a certain level of air pollution from Roberts Road, I-270, rail traffic, and surrounding industry.	
157	I agree with Laura Fay's statement. Buckeye Railyard is slowly becoming a desert.	See previous responses	