

Dear City of Columbus

The request by OSU to impact the Stream Corridor Protection Zone should not be permitted as requested for their Preferred Alternative for the following reasons:

1. It is unclear if their creation of mitigation credits is for this project or for future impacts. The "credits" discussed within the application is the term used in the "Guidelines for Stream Mitigation Banking and In-Lieu Fee Programs in Ohio" Version 1.1 March 2016, by USEPA and USACOE, which was used to determine relative value of the proposed mitigation measures vs. the impact. No credits to be used for future projects are proposed by this variance.
2. The mitigation of planting native grasses is the cheapest and least effective mitigation for the impacts of creating more impervious surface in this Stream Corridor Protection Zone. More compelling mitigation would be to change the profile of the stream and create a self forming channel by widening the stream at the bed elevation to create a less ditch-like-stream which provides more ecological services. The proposed mitigation plan meets the minimum requirements of the SWDM. We agree that a more robust plan would be beneficial, and suggested that to the OSU.
3. Sheet 4 of 5 is unclear. There are 3 colors and only 2 shown in the legend. What does the 3rd color represent? The third color appears to represent the proposed construction/drive maintenance zone (where 4:1 grading will be performed to meet the existing grade), i.e. part of the permanent unpermitted impact.
4. Sheet 4 of 5- Why does a tree need to be removed from the SCPZ? The proposed drive grade requires elevating this area by a few feet, to descend from the drive area down to the existing grade.
5. More than one tree is needed for a stream corridor mitigation plan! FLOW requests that native trees and shrubs be added to the mitigation plan. The proposed mitigation plan meets the minimum requirements of the SWDM. We agree that a more robust plan would be beneficial, and suggested that to the OSU.
6. Will OSU install the required SCPZ signage? Yes, the signage is required.
7. At a minimum, the proposed expansion of the SCPZ on the Right Descending Bank (south) should be extended to the furthest east point possible. Otherwise, how will mowers observe the protection of the sharp

boundary proposed. SCPZ markers will be required at all SCPZ line corners per SWDM 1.3.6.

Sincerely
Laura Fay
FLOW Science Committee Chairwoman