

OSU Cannon Drive Phase 2 SWDM Type III Variance.

Public comments received by the City in response to the 10/12/2022 and 12/02/2022 original and revised variance postings

No.	COMMENT	RESPONSE	ORGANIZATION
1	1. FLOW still objects to OSU's request for a hardship which will set a precedent that Stream Corridor Protection Zone widths are negotiable or hardships. They argue that it will be confusing to have conservation easement signs as well as stream corridor protection signs. After our numerous visits during cleanups along the Olentangy Restoration Stream Corridor, we have never observed Conservation Easement signs. FLOW requests that SCPZ signage be required at OSU and not removed like it was at Waterman Farm. Also, what is the loss of the Stream Corridor Protection Zone on the west bank as a result of this change and the loss of SCPZ acreage north for Phase 3? These losses in an area with high impervious surfaces, only 13 % tree canopy and other historical impacts to the river by OSU may prevent this section of stream from achieving its water quality restoration potential.	SCPZ will remain within the originally determined width/acreage. The variance only allows certain otherwise prohibited uses within the SCPZ. SCPZ signs will be installed. No SCPZ impact on the west bank of the river is requested nor approved by this variance. The original Conditional Approval Letter mistakenly stated "west bank" instead of "east bank". It has been reissued to correct the error. It is our understanding that the University has no current plans for the extension of Cannon Drive north of Woody Hayes Drive. Future Phase 3 is not part of this project, and is not addressed by this variance.	Friends of Lower Olentangy Watershed (FLOW)
2	2. FLOW requests more information related to Phase 3. It appears that the University is planning to extend Cannon Rd north of Woody Hayes Drive, which appear to propose impacts to the buffer of the jurisdictional wetlands (required by the Nationwide 27 permit from the Army Corps of Engineers) and the existing Olentangy Trail. It appears that OSU should not change the alignment and move Cannon Road closer to the river and keep it where it exists today. According to the graphic below, the stream Corridor Protection Zone should be expanded to include the wetlands.	Future Phase 3 north of Woody Hayes Dr. is not part of this project, and is not addressed by this variance. It is our understanding that currently there is no defined schedule for Phase 3.	Friends of Lower Olentangy Watershed (FLOW)
3	3. Also OSU argues that a SCPZ will delay their project. This does not appear to be the case per the Stormwater Drainage Manual, Section 1.3.6, Stream Corridor Protection Zone Signage Requirements: "Upon the conclusion of site development activities, the developer shall permanently delineate the Stream Corridor Protection Zone (SCPZ) in accordance with the following requirements, such that the location of the SCPZ is apparent to casual observers and restricted activities are identified." FLOW requests that signage be installed as required. 3. Also OSU argues that a SCPZ will delay their project. This does not appear to be the case per the Stormwater Drainage Manual, Section 1.3.6, Stream Corridor Protection Zone Signage Requirements: "Upon the conclusion of site development activities, the developer shall permanently delineate the Stream Corridor Protection Zone (SCPZ) in accordance with the following requirements, such that the location of the SCPZ is apparent to casual observers and restricted activities are identified." FLOW requests that signage be installed as required.	Agree, and the signage will be installed as part of this project.	Friends of Lower Olentangy Watershed (FLOW)
4	4. FLOW appreciates the reduction in mowed areas in the SCPZ. Are the proposed no-mow grasses natives that have deep roots? If not, it may not be helpful to introduce a species that could become invasive in the riparian area.	The proposed no-mow grasses meet the SWDM requirements for application within the SCPZ. Would suggest a discussion with the OSU.	Friends of Lower Olentangy Watershed (FLOW)
5	5. FLOW continues to disagree with the statement that there will be "No Loss of Function of the SCPZ. The only reason that the SCPZ might be poor quality here is because of previous impacts by OSU. Improvements are needed. FLOW also disagrees that there will be a significant uplift in passive recreational utility through the reconstruction of the Olentangy and tree planting.	The City's stream corridor protection policy is intended to preserve existing function and encourage improvements, but it may not correct every impact that existed before the regulation was adopted. If you desire enhancements beyond what the regulation may address then it is suggested that you discuss the opportunities you've identified with OSU.	Friends of Lower Olentangy Watershed (FLOW)
6	6. FLOW continues to have concerns about the protection provided by the proposed Environmental Easement with the City based on the existing OEPA Environmental Covenant which OSU has modified 3 times already since 2012. FLOW requests that the OSU request for hardship not be awarded due to the precedent setting. Additional information is also needed. What is the loss of SCPZ acreage via the proposed easement for the west side of the Olentangy River? What is the potential loss of SCPZ throughout campus from potential future requests?	Please see the response to 1; no SCPZ impact on the west bank of the river is requested nor approved by this variance. Future potential SCPZ impacts cannot be addressed through this variance. Suggest a discussion with the OSU.	Friends of Lower Olentangy Watershed (FLOW)
7	7. FLOW requests that OSU provide all 3 alternative options as required. The problem seems to be that OSU wants a meandering 500 year flood level berm in a very narrow corridor. The minimum width between the river edge and the Cannon Rd Edge is 164ft. This is not wide enough for the berm and the no planting zone and the SCPZ. Why isn't the Road being elevated like in Phase 1? This alternative should be provided. Potentially the third plan that could be evaluated is elevating Cannon Rd in the narrow area, just west of the stadium. FLOW would like to know the rationale for a meandering levee wall and how effective it will be since it does not seem to connect directly with Phase 1 wall.	The third Alternative – Full Compliance – was a "no project" alternative, requiring no Site Plan. The Applicant stated that this was based on site constraints and the purpose of the variance request. The proposed Phase II levee connects to the previously approved Phase I levee.	Friends of Lower Olentangy Watershed (FLOW)
8	8. What is the length of the meandering berm? And its cost? What is the length to extend Cannon Rd at the 500 Year Flood Level as an elevated Rd through Phase 2 and what are its costs? What are the estimated costs of a straight berm	It is our understanding that the requested costs are not currently available. Suggest a discussion with the OSU.	Friends of Lower Olentangy Watershed (FLOW)
9	9. The no plant zone is too close to the Olentangy, in a reach west of the Stadium near Cross Section A	Per the OSU, the park and landscape have conformed to the natural edges throughout the corridor. These concepts have been developed in accordance with long-term plans for the restoration of the corridor and input from the regulatory agencies throughout the design of the project.	Friends of Lower Olentangy Watershed (FLOW)
10	10. Will there be a loss of 100 year floodplain with this development when Cannon Dr is moved closer to the River near Woody Hayes Dr?	Yes, 20,742 cy of compensatory storage credit (created by the 5th Ave. Dam Removal Project) was requested by the OSU from the City for this project and has been approved by the City. The project, therefore, is fully compliant with the City SWDM floodplain preservation requirements.	Friends of Lower Olentangy Watershed (FLOW)
11	11. Should OSU consider a parking garage for the Stadium to accommodate Football traffic? It appears that OSU is trying to force too many functions in this area.	Per the OSU, at this time the university is not considering a parking garage in this area of campus. Suggest a discussion with the OSU.	Friends of Lower Olentangy Watershed (FLOW)

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12	12. FLOW would like a copy of the Mussel Survey done for the Open Cut for the new Siphon at OSU. Could you please email a copy to info@olentangywatershed.com?	The OSU has provided copies of Mussel Survey Report, the in-stream waiver extension, ODNR approval confirmation and mussel survey extension applicable to the 2023 construction. We will email these documents as requested.	Friends of Lower Olentangy Watershed (FLOW)
13	13. Will trees be planted in the Tree islands at the OSU parking lots as required? One tree for every 10 parking spaces? Also FLOW would like to see the Tree Island trees replaced at Carmack Lot 5.	Suggest a discussion with the OSU, as this is not related to the requested variance.	Friends of Lower Olentangy Watershed (FLOW)
14	14. Has there been an evaluation of the loss of the 100 year floodplain (teal 1.0% annual chance flood hazard) for the Olentangy River and how this will affect other areas downstream? This part of the Olentangy has been manipulated heavily and it appears to have a complex flooding pattern.	Please see the response to 10.	Friends of Lower Olentangy Watershed (FLOW)
15	15. Is there a proposed loss of 1.42 acres of Stream Corridor Protection Zone by OSU for this project? The cost of land in the Olentangy Watershed has an approximate \$100k per acre average cost. We believe the value of land is even higher near Columbus and hence should be valued even higher and that mitigation should be significantly more than 46 trees. FLOW would like the mitigation to include the removal of the parking lots in the riparian area along Olentangy River Rd (west side of the river).	Please see the response to 1. Additionally, the mitigation plan has been coordinated with the OEPA.	Friends of Lower Olentangy Watershed (FLOW)
16	16. FLOW hopes that this project will be improved to provide more ecological services and less aerially visual aesthetics. The river should not suffer.	The City's stream corridor protection policy is intended to preserve existing function and encourage improvements. If you desire enhancements beyond what the regulation may address then it is suggested that you discuss the opportunities you've identified with OSU.	Friends of Lower Olentangy Watershed (FLOW)