

Simpson Strong Tie SWDM Type III Variance.

Public comments received by the City in response to the 11/23/2022 and 01/09/2023 original and revised variance postings have been combined into the below document.

No.	COMMENT	RESPONSE	ORGANIZATION
1	The Far West Side Area Commission submits the following comments for consideration with the proposed variance request for the Simpson Strong-Tie Expansion Site. In November 2021, the Columbus and Franklin County Metro Parks opened the 20th Metro Park, Quarry Trails. This park represented collaboration between multiple parties to achieve rehabilitation of an abandoned quarry for not only mixed-use development, but conservation of land for the use of the greater community. Featured within the park is "a picturesque 25-foot waterfall and lakes." The Millikin Falls are truly beautiful and many in our community have taken joy in visiting the falls and parkland. This proposed variance request, however, will jeopardize this very waterfall and the potential this park represents. The wetlands the applicant wishes to "disturb," i.e., destroy, feed into the Roberts Millikin Ditch that in turn become the noted Millikin falls. Wetlands are vital instruments for improving water quality, especially through the removal of pollutants. As these waters already flow through a former railyard, still active tracks, and significant industrial areas, it is critical to preserve these natural filters contributing to the health of the falls, lakes, and parkland. It is essential to protect and enhance this new "recreation destination." Additionally, this area has become a corridor for a variety of wildlife that rely on access to these wetlands. With development pressures both to the south (Buckeye XO) and the north (Amazon Data Center), an attempt should be made to preserve remaining pockets of natural areas. The destruction of habitats such as these forces more wildlife into nearby residential communities with potential for conflict. We respectfully request the City encourage the applicant to continue exploring options for other locations within the Far West Side area better suited for reducing environmental impact. As noted in the report, the Hoffman Farm location just south of I-70 is a viable option. This site as already been through the rezoning process with our Commission, Development Commission, and City Council. We further encourage the City to explore options for land acquisition in this area in order to preserve and restore these wetlands. With connections being considered between the Far West Side / Hilliard to the Quarry Trails, potential for additional natural areas along Scioto Darby Road should be explored.	The City has provided your comment letter to the applicant, and the applicant responded by providing the following information. The response indicates that, as a result of the proposed development, the overall volume of runoff from the site will increase (which is a typical result of site development). However, in compliance with the Columbus Stormwater Drainage Manual (SWDM), the developer is required to control the rate of runoff leaving the site, so that it is lower or equal to the runoff rates leaving the site pre-development, for storm events of magnitude of up to a 100-year storm. The wetlands which are proposed to be created to mitigate the proposed impact to the existing wetlands will be hydraulically connected to the original remaining wetlands, and, through them, to Roberts Millikin Ditch, which eventually flows to the Quarry Trails Metro Park. Please also note that the SWDM Variance process can only address the SWDM-controlled matters. We encourage you to initiate a dialogue with the developer to address other, non-SWDM related issues. Thank you for taking the time to review this application and offer your thoughts and suggestions.	Far West Side Area Commission (FWSAC)
2	The application has insufficient information to determine if the stormwater variance request should be approved.	The application was revised based on the city's comments to the original submittal, resubmitted on January 6, and posted on the department website via this link –	
2a	The application appears to be incomplete.		
3	There is no figure that shows Roberts Millikin Ditch and the associated wetlands and the associated Stream Corridor Protection Zones with the proposed development footprint. There was no presentation about the watershed size to determine what the SCPZ width should be. Because this area is so heavily modified, it is not clear that USGS Stream Stats will be accurate. Can the City provide the drainage area upstream of this site for the calculation of the drainage area? Or is the drainage area really 0.58 square miles.	The City has provided the watershed information to the applicant, and the SCPZ width was determined based on this information. The application was revised based on the city's comments to the original submittal and resubmitted on January 6. Please refer to the City Variance website via the provided link above to view the revised	
4	To evaluate the variance request, concept development sketches for the entire development over the existing aerial or site footprint is needed before approval of this request is justifiable. What is the acreage of SCPZ intrusion?	The application was revised based on the city's comments to the original submittal and resubmitted on January 6. The requested information is available within the revised application; please refer to the City Variance website via the provided link above to view the revised application.	
5	How does this development relate to the existing Simpson Strong Tie Company Inc property at 2600 International St? Will the 2 sites (3 parcels) be combined? Or will the existing site be sold once the new development is built? Could the existing parking lot be utilized? Maps showing all three parcels and the proposed footprint should be provided.	It is our understanding that the site for which the variance has been requested is an expansion of the existing facility located west of it. We are not aware of any lot combination plans.	
6	The proposed parking lot is 50% of the size of the proposed warehouse space of 230,000 sq ft. Could a 2 story parking garage be built to utilize the site more effectively?	Please refer to the Section 4.2 of the revised variance application for a discussion related to the possibility of a parking garage on the site.	
7	Preferred Alternative- (Sec 3.3) Will the "stormwater bioswales associated with the parking lots to accommodate additional stormwater retention" provide retention above and beyond the amount required by the stormwater drainage manual?	The city will enforce full compliance with the SWDM requirements related to post-construction water quantity and quality SCPs. We are not aware of the plans to provide such SCPs in excess of what is required by the SWDM.	
8	Does the proposed Stormwater Basin meet the requirements of the manual? It does not appear to have a forebay for sediment removal?	In accordance with SWDM Section 3.1, forebays for privately owned and maintained wet basins are suggested, but not required.	
8a	Does the proposed wet retention pond meet the SW Manual requirements? Does it have a forebay for sediment removal?		
9	Preferred Alternative – (Section 3.4)- What indirect stream impacts will occur as a result of this alternative?	Other than the proposed wetlands impacts (which are SCPZ impacts, as these wetlands are contiguous with the stream SCPZ), no other SCPZ or stream impacts are proposed.	
10	Please provide maps showing the direction of the stream flow.	Please refer to the revised variance application via the provided link above.	
10a	Please provide maps showing the stream flow direction.		
10b	How will the remaining pieces of wetlands maintain their integrity without the water flow? It's difficult to tell without adequate drawings. If the integrity cannot be maintained, then the entire wetland should be considered to be impacted.		
10c	I recommend this application be modified to include the missing information and address all concerns before a full determination is made.		
11	Will the remaining wetlands pieces be able to continue their integrity without the flow of water? It is difficult to tell without adequate drawings. If not, then the entire wetland should be considered to be impacted.	Please refer to the revised variance application via the provided link above.	
12	Evaluation Areas: I'm confused. There are graphics for North, Central, and South Section evaluation areas. The Minimal Disturbance Alternative and Preferred Alternative focus on the expansion in the North Section evaluation area. Is just the North Section to be considered in this variance application? Why are the Central and South evaluation areas included in this application? It's a head-scratcher.	The impact was proposed to the wetlands 4 and 6, which are located in the South Section. The mitigation wetlands are proposed to be in the North Section (Wetlands 7 and 2). The mitigation wetlands are hydraulically connected to the Roberts Millikin Ditch via Wetland 5, which is in the Central Section. This was clarified in the revised variance application, available via the provided link (see above).	

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13	There is no graphic that shows Roberts Millikin Ditch and the associated wetlands and the associated Stream Corridor Protection Zones with the proposed development footprint. There is no information about the watershed size to determine what the SCPZ width should be. Because this area is so heavily modified, it is unclear that USGS Stream Stats will be accurate. Can the City provide the upstream drainage area for the calculation of the drainage area or is it really 0.58 square miles?	The city has provided the watershed information to the Applicant, and the SCPZ width was determined based on this information. Please refer to the revised Variance application linked above.	
14	To adequately evaluate this variance request, concept development sketches for the entire development over the existing aerial/site footprint is needed before approval of this request can be justified. What is the acreage of the SCPZ intrusion?	2.75 acres - please refer to the revised variance application linked above.	
15	Alternatives: The proposed parking lot appears to be about half the size of the warehouse space. Was any thought given to creating a multi-story parking garage so the site can be used more efficiently? What would prevent the use of a parking garage? Minimizing hardscape is a good thing!	Please refer to the Section 4.2 of the revised variance application for a discussion related to the possibility of a parking garage on the site.	
17	Other: Appendix C: pg. 232 – Minimal Disturbance Alternative – the existing wetland in the upper left corner of the drawing appears to be truncated when compared with the drawing for the Preferred Alternative on page 234. Please explain why this is. If it is in error, it needs to be corrected before a decision can be made about the variance request.	This has been corrected - please refer to the revised variance application linked above.	
17a	Appendix E: pg. 235 – USACE 404 Individual Permit Application – The labeling of Attachments in this section appears to be incorrect. This permit application has two different Attachment As. And Attachment D appears to not have an Attachment A section; it goes right to Attachment B. Why is this?		
18	Appendix D: pg. 234 – Preferred Alternative – The difference between this alternative and the one in Appendix C appears to be the location of the proposed wet retention pond. Are the proposed retention ponds in both drawings of equal size? If not, what is the reason for the difference and do they both meet the size requirement in the City's SW Manual?	The basin will be required to meet the SWDM requirements. This will be enforced during the plan preparation phase of the project.	
19	What indirect stream impacts will occur as a result of this alternative? None are discussed.	Other than the proposed wetlands impacts (which are SCPZ impacts, as these wetlands are contiguous with the stream SCPZ), no other SCPZ or stream impacts are proposed.	