

December 17, 2024

Greg Kufahl, PE
Project Engineer
Kimley-Horn
7965 N High St., Suite 200
Columbus, Ohio 43235

RE: Stormwater Drainage Manual (SWDM) Type II Variance Request – 3834-E, Sancus Blvd SUP

Mr. Kufahl:

This letter is in response to the subject variance request Type II (Non-Stream) to the 2024 SWDM Section 3 *Stormwater Control Practices*. More specifically, exemption is being sought from the SWDM Section 3.4.3.1a requirement of providing a green infrastructure SCP upstream of a City-owned underground SCP in the public R/W.

The SWDM variance application was submitted to the City on November 5, 2024. As part of the Variance review process, the subject Variance request was posted on the City website on November 19, 2024 to solicit public comments. No public comments were received by the posted due date. The Variance Review Committee has met and reviewed the subject variance application on December 11, 2024.

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

The project is located on Sancus Blvd between Worthington Galena Rd and Worthington Woods Blvd. The purpose of this City-funded project is to provide bike and pedestrian access along the west side of Sancus Blvd by way of a shared-use path (SUP), and to add street lighting for the length of the project. This project will install stormwater management facilities to handle both quality and quantity control following the proposed improvements, adhering to the 2024 City of Columbus Stormwater Drainage Manual and the Ohio EPA General Construction Permit – OHC000006.

Three alternatives were considered within the application - Full Compliance, Minimal Impact and the Preferred Alternative.

Full Compliance Alternative – The Full Compliance Alternative consists of an underground storage system paired with upstream bioretention areas behind the SUP. Bioretention areas were first considered between SUP and the curb but this area was found to be infeasible due to the existing waterline and other existing private utilities in that area that would require relocation. The bioretention areas would meet the green infrastructure requirements associated with the underground system but would result in significant R/W, tree, utility, and grading impacts beyond the impacts associated with the SUP. The grading required to facilitate the



bioretention areas and shallow swales would remove the mounding between the existing curb line and parking lots, remove most trees in this area, require the relocation of several private utilities, require extensive R/W acquisition to keep this full area within the R/W for future maintenance, and in some areas could affect the parking lots of the private parcels. Due to these conflicts and high costs, this Alternative was found to be not feasible.

Minimal Impact Alternative – The Minimal Impact Alternative consists of an underground storage system paired with a 7' vegetated filter strip between the SUP and the existing curb line upstream of a Hydrodynamic Separator (HDS). This alternative eliminates many of the concerns identified in the full compliance alternative. This design minimizes the R/W impact to only what is needed for the construction of the SUP. The use of small curb walls behind the SUP will help to maintain the mounding between the parking lot and the SUP and reduce the overall temporary impacts needed to construct the improvements. Several trees and existing utilities will also be saved by the reduction in the swale grading behind the SUP. As vegetated filter strips are not viewed by the SWDM as green infrastructure, this alternative would still be non-compliant. Additionally, the maximum achievable strip width without additional R/W acquisition would be 7 ft., falling short of the 10 ft. ODOT standard.

Preferred Alternative – The Preferred Alternative (Exhibit C) is very similar to the Minimal Impact alternative but removes the vegetated filter strip and only utilizes the HDS to provide the required pretreatment in combination with underground detention system. This alternative eliminates the need for pre-treatment infrastructure on the surface, where R/W is the limiting factor. All EPA standards will be met with this design and the City of Columbus quantity and quality control requirements will be met but the underground system will not be able to be paired with a green infrastructure practice.

After considering pros and cons of the above alternatives, and based on the recommendation of the Variance Review Committee, the Preferred Alternative is conditionally approved contingent upon the following stipulation:

- E-3834 plan and corresponding Stormwater Management Report must be submitted and approved by the City of Columbus.

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

Sincerely,



Robert S. Priestas, P.E., Administrator
Division of Sewerage and Drainage
cc: Variance Review Committee
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