KRISTEN L. ATHA
Director

THE CITY OF
COLUMBUS
ANDREW J. GINTHER, MAYOR

DEPARTMENT OF
PUBLIC UTILITIES

May 14, 2026

Douglas C. Turney, PE, CFM
Senior Water Resources Engineer
EMH&T, Inc.
5500 New Albany Road
Columbus, Ohio 43054

RE: Stormwater Drainage Manual (SWDM) Type II Variance Request – Blacklick Preserve, CC-20856

Mr. Turney:

This letter is in response to the subject variance request Type II (Non-Stream) to the SWDM Section 3.1 *Stormwater Control Practices - General Criteria*, and Section 3.2 *Stormwater Quantity Controls.* More specifically, two exemptions are being sought: from the SWDM Section 3.1 requirements prohibiting placement of Stormwater Control Practices (quantity) within the FEMA-designated 100-year floodplain, and Section 3.2 –requiring full application of stormwater quantity control requirements to compensatory floodplain storage areas as part of the overall stormwater management for the proposed development.

The request was submitted to the City on April 23, 2026. As part of the Variance review process, the subject Variance request was posted on the City website on April 27, 2026 to solicit public comments. No public comments were received by the posted due date.

The Variance Review Committee has met and reviewed the initial submittal of the subject Variance Request on May 13, 2026.

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

Three alternatives were considered within the application for both exemptions being sought - Full Compliance, Minimal Impact and the Preferred Alternative.

- Full Compliance Alternative:
    1. Section 3.1 – No development. The entire site is within the regulatory FEMA 100-year floodplain. Estimated costs to raise the proposed detention basin out of the floodplain, and subsequently the rest of the site to be able to drain into the basin would make the development unfeasible.
    2. Section 3.2 – Construction of an off-site detention basin, as it would not be possible to provide an additional detention basin within the compensatory floodplain storage area while also providing the required compensatory storage volume with an unrestricted hydraulic access to

the existing stream's floodplain. This alternative was viewed as not feasible due to high costs associated with procuring an off-site detention basin.

- Minimal Impact Alternative:
    1. Section 3.1 – On-site water quality SCP, and an off-site water quantity SCP. Similarly to the Full Compliance Alternative, this option would be cost-prohibitive.
    2. Section 3.2 –Providing no compensatory floodplain storage. Leaving the eastern portion of the site as it currently is, an agricultural land. While this alternative would reduce the required detention and would make providing such reduced detention possible, it would require importing a large amount of fill material for the western, development portion of the site. This alternative was viewed as not feasible for two reasons – non-compliance with compensatory floodplain storage requirements would be unlikely to be approved, and importing the required fill would be cost-prohibitive.

- Preferred Alternative:
    3. Section 3.1 – The proposed detention basin remains within the floodplain. It will have sufficient volume to store its tributary area's 100-year runoff volume without any outflow, in case floodplain activation prevents the required backwater valve at its outlet to remain shut.
    4. Section 3.2 –Allow the overall detention requirements to be reduced due to inability to stay at/below the required release rates impacted by the compensatory storage area disturbance, but for all design storm events, 1 year through 100 years, to be below the current pre-development rates of discharge for the overall development area, including the compensatory storage area.

Upon reviewing and discussing the application submitted by the applicant, the Variance Review Committee agreed with the applicant that the Preferred Alternative for both exemptions being sought represents a viable development plan showing the development team's good faith effort to comply with the applicable SWDM requirements. The Committee further agreed with the applicant's argument that both the Full Compliance and the Minimal Impact Alternatives would impact functional and economic viability of the proposed project to a point of making it infeasible.

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 stipulations:

- CC- plan and the corresponding Stormwater Management Report must be submitted and approved by the City of Columbus.
- The proposed detention basin top of bank elevation to be at least 12 inches above the BFE, with a backwater prevention device at the basin's outlet. The proposed detention basin's volume above the permanent pool to be sufficient to hold the entire 100-year runoff volume from its tributary area, and to reduce the proposed release rates to the maximum practical extent.

- The overall development site post-development stormwater runoff discharge rates to stay at or below the pre-development discharge rates of the same area for all design storm events, 1 year through 100 years.

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 By PWW
Division of Sewerage and Drainage

ec: Variance Review Committee
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