

October 15, 2026

Kyle Dixon, PE
Assistant Project Manager
Jon Demarest, PE
Senior Project Manager
Civil & Environmental Consultants, Inc.
8800 Lyra Drive, Suite 300
Columbus, Ohio 43240

RE: Stormwater Drainage Manual (SWDM) Type III Variance Request – Central College Apartments,
5953-6047 Central College Road

Dear Kyle Dixon and Jon Demarest:

This letter is in response to the subject variance request to the SWDM Sections 1.3.2 *Permanent Protection of the Stream Corridor* and 1.3.3 *Prohibited Uses in the Stream Corridor Protection Zone*. More specifically, SWDM Section 1.3.2 provides for permanent protection of the Stream Corridor Protection Zone (SCPZ), and Section 1.3.3 lists specific activities and facilities prohibited within the SCPZ, which include filling, excavation and other changes in topography as well as construction or expansion of buildings/structures and parking areas within the SCPZ. A variance is requested to allow construction of eight (8) multi-unit apartment buildings and standalone carriage houses for a total of 232 living units as well as a clubhouse, pool area, parking area, and associated utilities.

The request was submitted to the City on September 25, 2026. As part of the Variance review process, the subject Variance request was posted on the City website on the same day to solicit public comments. No public comments were received by the posted due date. The Variance Review Committee reviewed the subject Variance Request on October 14, 2026.

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

Three alternatives were considered within the application for the requested Section 1.3 variance - Full Compliance, Minimal Impact and the Preferred Alternative.

- Preferred Alternative - The Preferred Alternative for this redevelopment would allow for topography changes within the SCPZ. Specifically, the proposed SCPZ impact would be in the area where the existing 0.55 acre Wetland B is contiguous/overlapping with the otherwise delineated SCPZ, making it part of the overall SCPZ. This alternative optimizes constructability and operational efficiency, while keeping the proposed SCPZ impact within the limits of a Category 1 wetland.
- Minimal Impact Alternative – The Minimal Impact Alternative will require some SCPZ encroachments, albeit at a smaller scale vs. the Preferred Alternative. It will reduce the proposed SCPZ impact by eliminating one of the proposed residential buildings, creating 208 residential units vs. the Preferred Alternative's 232 units.
- Full Compliance Alternative – The Full Compliance Alternative would avoid any changes within the SCPZ. This alternative would require downsizing of the proposed development by 72 residential units and 37 parking spaces vs. the Preferred Alternative.



The proposed Preferred Alternative SCPZ mitigation plan includes planting of 14 2-inch tree saplings to account for the vegetation to be removed based on the tree survey and the draft RiVR tool calculations. Additional restoration and enhancement of the remaining SCPZ includes invasive species removal on 0.38 acres of the existing SCPZ, with 30 trees and 100 shrubs of native vegetation species planting. It is expected that approximately 0.16 acres of added SCPZ/conservation easement and 0.50 acres of enhanced SCPZ would be generated by the proposed mitigation plan. In addition to the on-site mitigation plan to address SWDM requirements, the applicant is also pursuing a OEPA Level 2 Isolated Wetland Permit requiring purchasing non-forested mitigation credits at 2:1 ratio through an OEPA wetland bank.

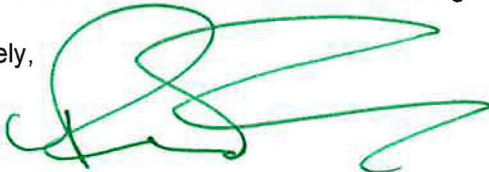
Upon reviewing and discussing the application submitted by the applicant, the Variance Review Committee agreed with the applicant that the Preferred Alternative with the proposed SCPZ mitigation plan represents the owner's team's good faith effort to comply with the SWDM stream protection requirements to the maximum practical extent. The Committee further agreed with the applicant's argument that the Full Compliance and Minimal Impact Alternatives will create significant economic hardship and functional limitations for the applicant.

In light of the above, the subject Variance Request (Type III SWDM Section 1.3), Preferred Alternative is conditionally approved contingent upon the following stipulations:

- The remaining SCPZ and the additional mitigation/SCPZ area compensating for the proposed permanent SCPZ impact to be covered by a conservation easement dedicated to the City. Overlapping of the existing Scenic/Conservation/Walkway-Bikeway easement granted to the City in 2006 with the new conservation easement will be required and is acceptable.
- The proposed mitigation/planting plan for the conservation easement areas to include trees and other plantings of native species to be coordinated with the City during the plan review process.
- Storm CC-Plan and Stormwater Management Report must be submitted and approved by the City.

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 Water Reclamation

pc: Variance Review Committee
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