

Kristen Atha
Director

October 16, 2023

Donald R. Phifer, PE
Senior Roadway and Traffic Engineer
Osborn Engineering
130 East Chestnut Street, Ste 401
Columbus, Ohio 43215

RE: Stormwater Drainage Manual (SWDM) Type II Variance Request – Trabue Rd. (FRA-CR27-1077 and FRA-CR27-1089), 3902-E

Mr. Phifer:

This letter is in response to the subject variance request to the SWDM Sections 3.2 *Stormwater Quantity Controls*. More specifically, SWDM Section 3.2 requires stormwater quantity controls facilities to be provided to control runoff before it is discharged offsite. The goal of the project is to improve two bridges on Trabue Rd. between Lake Shore Drive and Riverside Drive. A variance is requested to exempt the project from the Section 3.2 stormwater quantity control requirements due to technical, space and financial hardship.

The original request was submitted to the City on August 4, 2023. As part of the Variance review process, the subject Variance request was posted on the City website on August 15, 2023 to solicit public comments. No public comments were received in response to the posting. The Variance Review Committee met and reviewed the subject Variance application on August 30, 2023, resulting in comments consisting of a request for additional information and clarifications. In response to the comments and following some additional discussions with the Plan Review staff, a revised variance application was submitted by the applicant on September 22, 2023, and posted on the City website on September 26, 2023. No public comments were received in response to the second posting. The Variance Review Committee met on October 11, 2023 to review the revised application.

The submitted variance application was found by the Variance Review Committee to be in compliance with the SWDM Type II Variance application requirements.

Three alternatives were considered within the application for the requested Section 3.2 variance – Full Compliance (No Impact), Minimal Impact and the Preferred Alternative.

- Preferred Alternative – This Alternative fulfills the overall project purpose and need by providing the required improvements and also SWDM-required water quality controls per SWDM Section 3.3. However, no water



quantity controls would be provided, requiring a variance from the SWDM Section 3.2 Stormwater Quantity Controls requirements.

- Minimal Impact Alternative – This Alternative would provide underground storage (oversized storm sewers) in Trabue Rd. R/W to fulfill the detention (water quantity control) requirements of the SWDM. However, this alternative would still be non-compliant as it would be in violation of SWDM 3.4.3.1 requiring green infrastructure to be used in conjunction with underground storage, and also prohibiting the use of oversized storm sewers in the R/W.
- Full Compliance (no Impact) Alternative was found to be not feasible due to lack of suitable space for surface stormwater detention, as well as the financial burden outside of the available budget for underground detention.

Upon reviewing and discussing the application submitted by the applicant, the Variance Review Committee agreed with the applicant that the Preferred Alternative would not result in negative impact to surrounding properties and flooding conditions along the river. Furthermore, it will provide much needed transportation improvements for the Franklin County Engineer's Office while keeping the project within the available grants and loans from MORPC and OPWC, allocated for this project. The Committee further agreed with the applicant's argument that the Full Compliance Alternative would not be feasible due to the project's site limitations, and the Minimal Impact Alternative would make the project unfeasible due to lack of funds to construct it.

In light of the above, the subject Type II Variance Request, Preferred Alternative is conditionally approved contingent upon the following stipulations:

- 3902-E Plan and associated Stormwater Management Report, based on the Preferred Alternative as described in the subject Variance Application, Preferred Alternative 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

pc: Variance Review Committee
File

