

November 14, 2022

Nicholas D. Mill, PE
Project Manager
ADR & Associates, Ltd.
88 West Church St.
Newark, Ohio 43055

RE: Stormwater Drainage Manual (SWDM) Type II Variance Request – American Self Storage, Phase 2

Mr. Mill:

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*. More specifically, exemptions are being sought from the SWDM Section 3.1 requirements prohibiting placement of Stormwater Control Practices (quantity) within the 100-year floodplain, and prohibiting storage capacity below the Base Flood Elevation (BFE) from being included in the total storage capacity calculations.

The request was initially submitted to the City on August 19, 2022, with a subsequent final resubmission on October 17, 2022. The Variance Review Committee has met and reviewed the initial submittal of the subject Variance Request on September 14, 2022, and then to review the final submittal on November 9, 2022. As part of the Variance review process, the subject Variance request was posted on the City website on August 29, 2022 and October 17, 2022 to solicit public comments. No public comments were received by the posted due dates.

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

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

- Full Compliance Alternative – Several options were considered under the Full Compliance Alternative – a detention basin located above the BFE, underground detention, rooftop detention, parking lot ponding and a combination of these options. All of these options were found to be unfeasible due to FEMA and Columbus floodplain code requirements and also due to high costs of construction.
- Minimal Impact Alternative – Elevating the site above the BFE, obtaining a LOMR-F and then construction the Phase II improvements outside of the floodplain, but with some storage below the BFE. This Alternative has also been found to be not viable due to economic (high costs) and schedule/time hardship.



- Preferred Alternative – Expanding the existing detention basin at its present location within floodplain, maximizing beneficial space use and making the proposed development economically and functionally viable.

Upon reviewing and discussing the application submitted by the applicant, the Variance Review Committee agreed with the applicant that the Preferred Alternative 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 commercial project to a point of making it infeasible.

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

- Storm CC-Plan and Stormwater Management Report compliant with the 2021 SWDM (with the approved variance) must be submitted and approved by the City of Columbus.
- The proposed detention basin top of bank elevation to be 12 inches above the BFE, with a backflow prevention device at the basin's outlet.
- Lowest proposed finished floor elevations to be at least 18 inches above the BFE.

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., Acting Administrator
Division of Sewerage and Drainage

ec: Variance Review Committee
File