

September 11, 2025

Eric Onderak, PE
Senior Engineer
Coldwater Consulting, LLC
995 South High Street
Columbus, OH 43206

RE: Stormwater Drainage Manual (SWDM) Type II and Type III Variance Request – Parsons Avenue Water Plant (PAWP) Wellfield Expansion

Dear Eric Onderak:

This letter is in response to the subject Type III 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 buildings/structures, removal of native trees, filling, excavation, and other changes in topography within the SCPZ. Additionally, a Type II SWDM Variance request to the SWDM Section 3.1.1 which prohibits placement of stormwater control facilities within the SCPZ was also requested within the application. The variance request was necessitated by a need to construct a new well house structure with an associated raw water main, asphalt/gravel access drive and a gravel parking/maintenance area. The goal of the project is to satisfy long-term water supply needs of the City of Columbus by expanding its raw water pumping capacity at the Parsons Avenue Water Plant.

The variance application was submitted to the City on August 15, 2025. As part of the Variance review process, the subject Variance request was posted on the City website on August 15, 2025 to solicit public comments. A public comment from a concerned citizen was received on August 18, 2025 in response to the posting. The Variance Review Committee has met and reviewed the subject Variance application on September 10, 2025.

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

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

- Full Compliance Alternative – This alternative would not be feasible on the project site due to practically all of the site being within the 100-year FEMA floodplain/floodway and



SCPZ. Identification of a new site would require multiple years to find and procure the site, extensive groundwater testing and environmental approval work without any guarantees that the site would be suitable for the project goals of providing sufficient water supply capabilities. Such re-work would also require a significant additional expenditure of public funds needed elsewhere. Therefore, such possibility was reviewed and found to be unfeasible.

- Minimal Impact Alternative – This alternative would move the proposed well house structure and the adjacent gravel maintenance/parking area closer to the site entrance off of London-Groveport Rd., thus shortening the length of the access drive and therefore reducing the proposed SCPZ impact. This alternative would require a significantly longer raw water main as the new well would be farther away from the PAWP treatment facilities. Additional testing to confirm the anticipated pumping rates with an uncertain outcome, additional environmental approval activities and the required project re-design would result in significant time delays and extra costs. For these reasons, this alternative was not viewed as a viable alternative.
- Preferred Alternative – This alternative would install a new collector well structure and associated improvements consisting of a building housing the well, raw water main, gravel/asphalt access drive and a maintenance/parking lot at a location found to be suitable to produce the required high quality water supply. The site of the proposed well has been acquired by the City for this specific purpose, and has completed an extensive study, testing and environmental permitting process to be able to proceed with the project. The Preferred Alternative represents the City's and the design team's best effort to provide a reliable, consistent and long-term water supply needed for the growing potable water needs of the City.

As mitigation for the proposed SCPZ impacts, the following conceptual plan has been proposed. Temporary impacts are required for utility line installations and compensatory floodplain storage; permanent impacts are required for the building, access drive and a parking/maintenance area installation. The proposed mitigation plan includes installation of 11.81 acres of native wildflower and grass meadow to replace cultivated land it presently is, which is proposed to be designated a conservation area. The proposed meadow will also serve as a stormwater control practice by reducing the runoff curve number and providing water quality treatment. Additionally, 139 native species trees are proposed to be planted in compliance with the Mayor's Executive Order 2015-031.

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 impact mitigation plan represents the applicant's good faith effort to comply with the SWDM stream protection and non-stream protection requirements to the maximum practical extent. The Committee further agreed with the applicant's argument that the Full Compliance Alternative is not feasible on this project, and the Minimal Impact Alternative would also be not be feasible due to its functional shortcomings as well as significant time, cost and regulatory implications.

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

- Storm CC-Plan and Stormwater Management Report must be submitted and approved by the City of Columbus. The plans shall include an SCPZ impact mitigation plan as conceptually described above and in the variance application submitted to the City on August 15, 2025, which must be approved and deemed acceptable by the City.
- SCPZ signs and markers will need to be installed per SWDM requirements to demarcate the SCPZ/conservation area.

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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