KRISTEN L. ATHA
Director

THE CITY OF
COLUMBUS
ANDREW J. GINTHER, MAYOR

DEPARTMENT OF
PUBLIC UTILITIES

April 23, 2025

Elie Sabbagh, PE, ENV SP
Hazen and Sawyer
John Shady, PWS
Coldwater Consulting
150 E. Campus View Boulevard, Suite 200
Columbus, OH 43235

RE: Stormwater Drainage Manual (SWDM) Type III Variance Request – City of Columbus Home Road Water Plant

Dear Elie Sabbagh and John Shady:

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 required for the proposed construction access and staging area, and construction of a clearwell structure required for the proposed City of Columbus Home Road Water Plant within the SCPZ of two existing intermittent streams.

The request was submitted to the City on March 17, 2025. As part of the Variance review process, the subject Variance request was posted on the City website on March 28, 2025 to solicit public comments. No public comments were received by the posted deadline. The Variance Review Committee reviewed the subject Variance Request on April 21, 2025.

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.

- Full Compliance Alternative –Options to upgrade the existing water plants were reviewed, but found unfeasible. The Full Compliance Alternative would require construction of the needed 4th water plant on the Home Rd. site acquired by the City for this purpose in 2014. As only the northern part of the site is available for the facility construction, avoiding SCPZ impacts would require major changes to the clearwell geometry reducing the required treatment capacity, and also impact construction operations, making the project unfeasible.
- Minimal Impact Alternative – Similar to the Full Compliance Alternative, the Minimal Impact Alternative would also require major changes to the clearwells layout, making them deeper to

reduce their footprint. This Alternative, while reducing the proposed stream impact, would also negatively affect the available contractor staging operations space. Additional costs and functional/operational impairments resulting from implementing this Alternative would make the project unfeasible.

- Preferred Alternative - The Preferred Alternative is a result of a thorough study of the functional and operational needs of the Home Road Water Plant, and will fulfill the City's goals for additional water treatment capacity while minimizing construction and operation costs.

To mitigate the proposed under the Preferred Alternative direct stream and SCPZ impact including two wetland sites overlapping with the SCPZ, a new on-site mitigation stream is proposed at the northeast corner of the site which will fulfill (exceed) the 1:1 ratio requirement for both stream length and SCPZ acreage. The proposed stream work would include construction of floodplain benching and planting of trees within the proposed SCPZ.

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 direct stream impact/SCPZ mitigation plan represents the applicant'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 compromise the intended water treatment capacity augmentation goal of the project, resulting in substantial extra costs and impairing the proposed project's functional and operational needs.

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:

- Storm CC-Plan and Stormwater Management Report must be submitted and approved by the City of Columbus. The plans shall include a direct stream and SCPZ mitigation plan as conceptually described in the variance application.

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