

June 21, 2017

City of Columbus, Division of Sewerage & Drainage Attn: Mr. Greg Fedner, P.E. Private Development Section Manager 910 Dublin Road Columbus, Ohio 43215

Subject: OhioHealth Administrative Offices and North Parking Lot Type III Variance from Stormwater Drainage Manual

Dear Greg,

On behalf of OhioHealth, EMH&T is submitting an application for a Type III variance from the City of Columbus Stormwater Drainage Manual for the proposed OhioHealth Administrative Offices and North Parking Lot projects.

The proposed development sites include a 147-foot wide Stream Corridor Protection Zone (SCPZ) along Slyh Run, along the southern boundary of the Administrative Offices site; and a 210-foot wide SCPZ along Turkey Run, along the northern boundary of the North Parking Lot site. In both cases, the existing site improvements already encroach within the SCPZ and the planned development represents little or no additional encroachment within the SCPZ. The proposed development will not result in direct impacts to either stream. We are seeking a Type III variance for approval of the proposed encroachments.

The mitigation plan developed for and included as part of this variance application has been developed in coordination with the City's Department of Recreation and Parks. The proposed mitigation represents a significant ecological benefit that exceeds the SCPZ impacts associated with the two proposed development sites.

In addition, at the City's request, the application document provides a discussion of how the project will remove areas from the 100-year floodplain that are currently proposed for stormwater management features, thereby eliminating the need for a variance specific to that activity.

The following information is provided in support of the application:

- Project Name: OhioHealth Administrative Offices and North Parking Lot
- Address, PID, Site Disturbance and Total Site Area:

	Administrative Offices	North Parking Lot
Address:	3483 Olentangy River Road,	3720 Olentangy River Road,
	Columbus, Ohio 43214	Columbus, Ohio 43214
PID:	010-183740-00	010-007910-00
Site Disturbance:	11.27 acre	4.77 acres
Total Site Area:	14.54 acres	8.19 acres

Primary (Owner) Contact:

 Douglas Scholl, AIA
 OhioHealth, Real Estate, Construction and Facilities
 3535 Olentangy River Road, Columbus, Ohio 43214
 614.566.3641 (office) 614.581.2356 (cell)
 douglas.scholl@ohiohealth.com

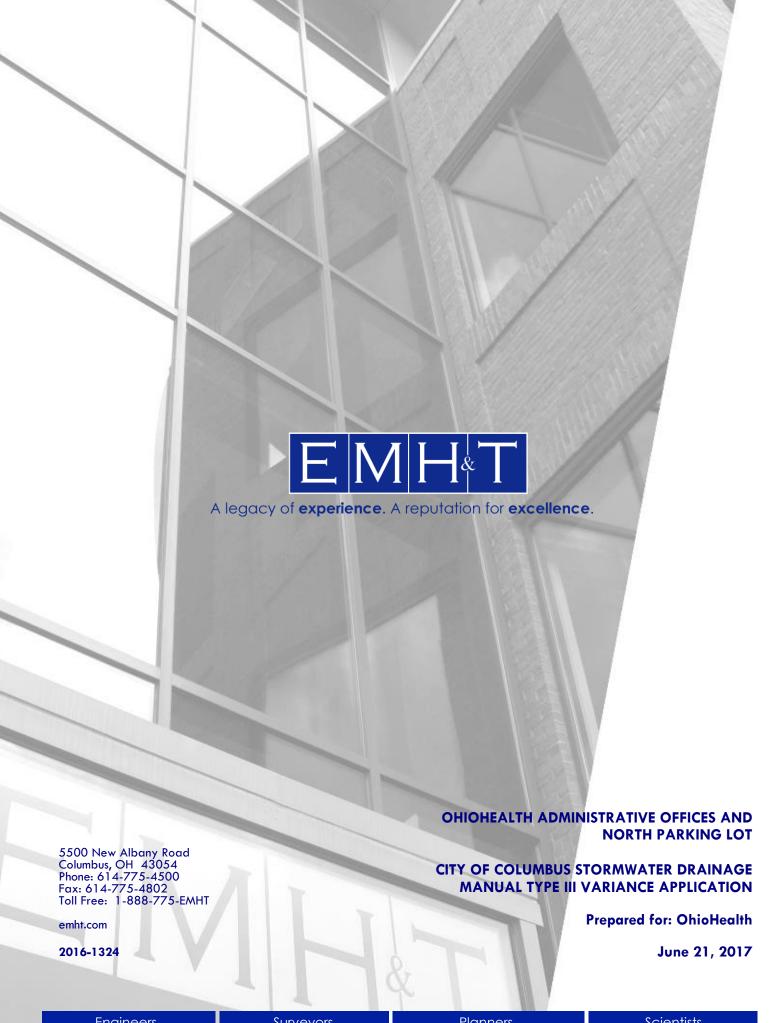
The City is aware of the need to expedite the review and approval of this variance to the extent possible. Considerable pre-application coordination has occurred to this point and we request that the City respond by issuing the requested variance at the conclusion of the minimum required two week comment period.

Additional information pertaining to the requested variance is included in the enclosed application document. Please contact me with any questions you may have at (614) 775-4205, or by email at <a href="mailto:mhebert@emht.com">mhebert@emht.com</a>.

Sincerely,

Miles F. Hebert, PE, CFM, LEED Green Associate Director, Water Resources Engineering

Cc: Mr. Douglas Scholl, AIA, OhioHealth



Engineers Surveyors Planners Scientists



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Appendix A: OhioHealth Administrative Offices Overall Storm Sewer and Grading Plan

OhioHealth Administrative Offices and North Parking Lot Columbus Stormwater Drainage Manual Variance Application

Appendix B: OhioHealth North Parking Lot Overall Grading Plan



#### 1.0 INTRODUCTION

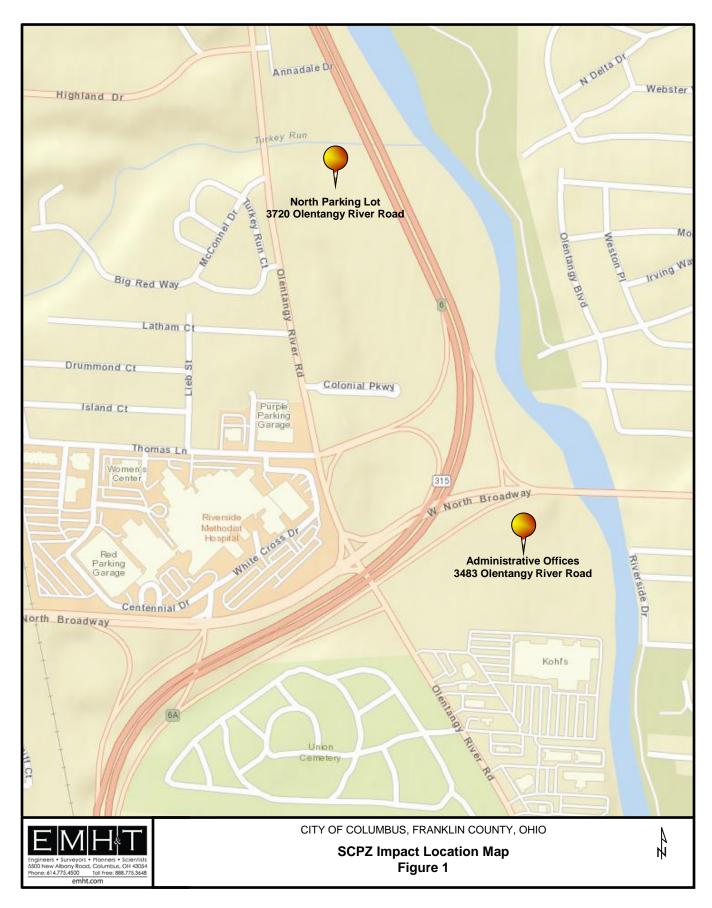
The following report provides information pertaining to a requested variance from the City of Columbus Stormwater Drainage Manual (the Manual) for the proposed OhioHealth Administrative Offices and North Parking Lot projects.

The OhioHealth Administrative Offices are proposed to be constructed on an approximately 12-acre parcel located at 3483 Olentangy River Road, which is east of Olentangy River Road and south of West North Broadway (refer to Figure 1). The site is currently composed of an existing service building, parking lots and open space. Slyh Run borders the site to the south. The proposed project involves the redevelopment of the site into a new office building and associated surface parking lots.

A large portion of the Administrative Offices site is currently utilized as surface parking for OhioHealth associates. The development of the site will result in a loss of this parking. Up to 1,250 existing parking spaces for OhioHealth employees are expected to be lost. The North Parking Lot is intended to help offset that loss. The approximately 8-acre North Parking Lot site is located at 3720 Olentangy River Road, which is east of Olentangy River Road along McConnell Drive (refer to Figure 1). Turkey Run borders this site to the north. The proposed project involves the demolition of existing commercial buildings and expansion of existing parking into a larger surface parking lot.

In conjunction with the proposed development, OhioHealth is seeking a Type III variance for encroachment within onsite Stream Corridor Protection Zones (SCPZ) along Slyh Run and Turkey Run. Additionally, at the City's request, this document provides a discussion of how the project will remove areas from the 100-year floodplain which are currently proposed for stormwater management features, thereby eliminating the need for a variance specific to that activity.







#### 2.0 TYPE III VARIANCE (STREAM PROTECTION)

The Stream Corridor Protection Zone (SCPZ) consists of the stream channel and the adjacent riparian area. Its purpose is to allow the natural, lateral movement of the stream, provide sufficient area for flood conveyance, protect water quality and prevent structures from being impacted by natural streambank erosion. A SCPZ is present along Slyh Run at the Administrative Offices site and along Turkey Run at the North Parking Lot site. The preferred development plans will encroach upon the SCPZs. At both locations, the encroachment will occur primarily within land that is currently paved. The proposed development will not result in direct impacts to either stream channel.

OhioHealth is requesting a variance from Section 1.3.2 and 1.3.3 of the Manual for both the Administrative Offices site and the North Parking Lot site, specifically a variance allowing for earthwork and the re-construction of parking area within the SCPZ.

### 2.1 OhioHealth Administrative Offices (3483 Olentangy River Road)

#### 2.1.1 Proposed SCPZ Impacts

As shown on Sheet 1, Slyh Run has a drainage area of 0.99 square mile. Accordingly, based upon the criteria provided in the Manual, Slyh Run has a SCPZ width of 147 feet. Under the Preferred Alternative, discussed below, the proposed area of impact within the SCPZ is 0.597 acre (refer to Sheet 2). The requested encroachment will occur nearly entirely within the limits of existing pavement. There will be no impacts to the Slyh Run channel, nor the existing trees/brush within the existing narrow riparian corridor. The area to be encroached upon is already paved, thus there will be no detrimental impacts to the riparian corridor or water quality of Slyh Run as compared to current conditions.

As further discussed below, the proposed encroachment within the SCPZ includes earthen excavation to lower the existing paved areas and provide the required compensatory floodplain storage volume, which is a permissible activity within the SCPZ. Avoidance of the SCPZ under the No Impact Alternative (Sheet 3) would result in an overall reduction in floodplain volume for the project site.

#### 2.1.2 Existing Conditions

The site is currently composed of one building, two large shuttle parking lots, driveways and undeveloped open space. Access to the site is from Olentangy River Road and consists of a single asphalt drive. Slyh Run traverses the southern property boundary. The development of the existing facilities pre-dates the current SCPZ requirements, and the existing building, parking lot and access drive are partially located within the designated SCPZ of Slyh Run. The existing riparian corridor along Slyh Run ranges from less than 10 feet wide to approximately 20 feet wide between the existing access drive/parking lot and the stream channel.



#### 2.1.3 Site Development Alternatives

# Proposed Conditions / Preferred Plan Alternative

As shown on the Overall Storm Sewer and Grading Plan (Appendix A), the project as proposed includes construction of an office building and associated surface parking lots. Access to the site will continue to be provided by the access drive from Olentangy River Road. As shown on Exhibit Sheet 2, the improved access drive and a portion of the southern parking lot on the site will be located within the Slyh Run SCPZ, resulting in **0.597 acre** of impact. The proposed impact includes 0.013 acre of impacts to existing pervious surface and 0.584 acre of impacts to existing impervious surface. Additionally, under the preferred alternative, 0.156 acre of new pervious surface will be provided within the SCPZ, as shown on Sheet 2.

#### Full Compliance / No-Impact Alternative

As described herein, the encroachment proposed within the Slyh Run SCPZ is located within the limits of existing pavement. Based on conversations with City of Columbus staff, it is understood that milling and resurfacing the existing pavement within the SCPZ is not subject to regulation under the Manual. Accordingly, the full compliance / no-impact alternative (shown on Sheet 3) includes only the milling and resurfacing the existing pavement within the SCPZ. The no-impact alternative would maintain the existing conditions within the SCPZ; however, it would also result in more impervious surface in the SCPZ as compared to the preferred alternative, as summarized in Table 1.

Table 1
Comparison of Alternatives for Administrative Offices Site

Altornative	SCPZ Cover (acres)*			
Alternative	Alternative Impervious		Total	
Existing Conditions	0.584	0.013	0.597	
Preferred Plan Alternative	0.441	0.156	0.597	
No Impact Alternative	0.584	0.013	0.597	

<sup>\*</sup>Includes only the areas impacted by the proposed project

Because the preferred alternative decreases the impervious acreage within the SCPZ as compared to current conditions, it is also being considered the minimal impact alternative for the purpose of this variance application. This variance application does not contemplate expanding the riparian corridor along Slyh Run, as that would remove parking spaces that are vital to the project.

#### 2.1.4 Impacts to Stormwater Detention and Water Quality

The Preferred Alternative increases pervious area, thereby reducing the volume of stormwater runoff to Slyh Run, as well as providing some benefits toward post-construction water quality. Furthermore, the proposed larger site development at this location includes the implementation of stormwater management features which will provide both detention and post-construction water quality, which are not present under existing conditions. Furthermore, the Preferred Plan Alternative does not represent any greater impact to the stream channel riparian corridor than either existing conditions or the No Impact Alternative described above.



#### 2.1.5 Statement of Hardship

The proposed impact to the SCPZ at the Administrative Offices site, associated with the Preferred Plan Alternative, is at least partially driven by the requirement to provide compensatory floodplain storage volume, as required by Section 1.4 of the Manual. Implementation of the No-Impact Alternative would eliminate the ability to provide the required compensatory floodplain storage volume. In addition, the Preferred Plan Alternative results in a net gain of pervious surface within the SCPZ. Thus, OhioHealth respectfully requests approval of the variance for the Preferred Plan Alternative.

# 2.2 North Parking Lot (3720 Olentangy River Road)

#### 2.2.1 Proposed SCPZ Impacts

As shown on Sheet 4, Turkey Run has a drainage area of 2.53 square miles. Accordingly, based upon the criteria provided in the Manual, Turkey Run has a SCPZ width of 210 feet. Under the Preferred Alternative, discussed below, the proposed area of impact within the Turkey Run SCPZ is 0.311 acre (refer to Sheet 5). The SCPZ encroachment will occur primarily within the limits of existing pavement. There will be no direct impacts to the Turkey Run channel. As the majority of the area to be encroached upon is already paved, there will be minimal impacts to the water quality of Turkey Run as compared to current conditions.

## 2.2.2 Existing Conditions

The site is currently composed of two buildings, parking lots, driveways and open space. Access to the site is provided via two drives from Olentangy River Road. Turkey Run traverses the northern property boundary within an approximately 50-foot wide grassy corridor. No trees or brush are present along the stream. The current onsite development pre-dates the SCPZ requirements, and the existing parking lot and northern access drive are partially located within the designated SCPZ of Turkey Run.

#### 2.2.3 Site Development Alternatives

Proposed Conditions / Preferred Plan Alternative

As shown on the Overall Grading Plan (Appendix B), the proposed project includes grading and installation of a new parking lot. Both onsite buildings will be demolished to expand the parking lot area. Access to the site will continue to be provided by two drives from Olentangy River Road. As shown on Sheet 5, the proposed parking lot improvements will encroach within the Turkey Run SCPZ, resulting in **0.311 acre** of impact. The proposed impact includes 0.145 acre of impacts to existing pervious surface and 0.166 acre of impacts to existing impervious surface (53%). Under the preferred alternative, 0.020 acre of new pervious surface will be provided.

Full Compliance / No-Impact Alternative

As described herein, the encroachment proposed within the Turkey Run SCPZ is located primarily within the limits of existing pavement. Based on conversations with City of Columbus staff, it is understood that milling and resurfacing the existing pavement within the SCPZ is not subject to regulation under the Manual. Accordingly, the full compliance / no-impact alternative (Sheet 6)



includes only milling and resurfacing the existing pavement within the SCPZ. This would maintain the existing conditions within the SCPZ, as summarized in Table 2.

Table 2
Comparison of Alternatives for North Parking Lot

Alternative	SCPZ Cover (acres)*			
Alternative	Impervious	us Pervious Total		
Existing Conditions	0.166	0.145	0.311	
Preferred Plan Alternative	0.291	0.020	0.311	
No Impact Alternative	0.166	0.145	0.311	

<sup>\*</sup>Includes only the areas impacted by the proposed project

Because the preferred plan alternative impact is so minor (net gain of 0.125 acre of impervious surface), a minimal impact alternative has not been developed. As described for the Administrative Offices site, this variance application does not contemplate expanding the riparian corridor along Turkey Run, as that would remove parking spaces that are vital to the project. Moreover, per the City of Columbus, an expanded riparian corridor along Turkey Run could not be planted with native vegetation due to previous concerns and legal actions regarding flooding and the City's associated maintenance program.

#### 2.2.4 Impacts to Stormwater Detention and Water Quality

The proposed site improvements include provisions for stormwater management features to provide both detention and post-construction water quality, which are not present under existing conditions. The minimal increase in impervious area even with the Preferred Plan (0.125 acres) is not seen as a detrimental impact to the water quality of this urbanized stream corridor. Furthermore, the Preferred Plan Alternative does not represent any greater impact to the stream channel riparian corridor than either existing conditions or the No Impact Alternative described above.

#### 2.2.5 Statement of Hardship

The development planned on the OhioHealth Administrative Offices site will result in the loss of up to 1,250 existing parking spaces currently used by OhioHealth employees, primarily those working at Riverside Hospital. Employees currently park at the existing lots on the Administrative Offices site and are shuttled to Riverside and other OhioHealth facilities along Olentangy River Road. The North Parking Lot is being developed to provide sufficient parking spaces to offset those lost. The parking lot improvements within the Turkey Run SCPZ are necessary in order to optimize the available parking on the site, and improve the skewed intersection condition at McConnell Drive. Thus, OhioHealth respectfully requests approval of the variance for the Preferred Plan Alternative.

#### 2.3 Mitigation

As described in the Manual, adequate mitigation must be provided for impacts to the SCPZ by creating equivalent mitigation also within a SCPZ. The proposed area of SCPZ impact between the two sites totals **0.908 acre**, including 0.597 acre within the Slyh Run SCPZ and 0.311 acre within the Turkey Run SCPZ. Of this total, there is a 0.143 acre increase in pervious area along Slyh Run and a 0.125 decrease in pervious area along Turkey Run, or a net increase in pervious



area of 0.018 acres between the two sites. The Manual states, "Generally, mitigation SCPZ will be considered equivalent if it performs the same function as the disturbed SPCZ."

It is the City of Columbus' preference that mitigation occur on the same site as the SCPZ encroachment, or as close as possible if onsite mitigation is infeasible. The Manual specifies that mitigation should consist of equivalent SCPZ created at the following ratios: 1:1 onsite, 1:1.5 on an adjacent site, 1:2 in the same watershed assessment unit, 1:3 in the same county, and 1:5 in a contiguous county.

Therefore, OhioHealth first considered the feasibility of onsite mitigation. On the Administrative Offices site, it was not feasible to complete onsite mitigation. OhioHealth owns only approximately 700 feet of the north streambank of Slyh Run, and there are no other streams on the property. Completing mitigation within the Slyh Run SCPZ that would have a meaningful benefit on the channel is seen as impractical given the site constraints.

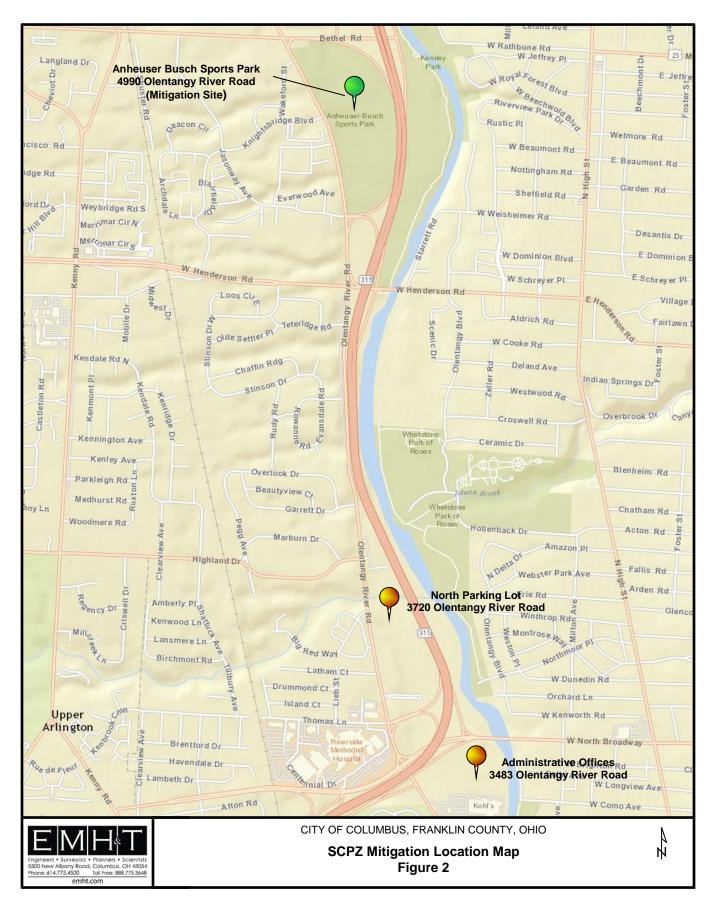
Onsite mitigation was also evaluated on the North Parking Lot site. OhioHealth developed a conceptual plan for mitigation along Turkey Run between Olentangy River Road and State Route 315, along the northern boundary of the site. This plan provided a total SCPZ mitigation area of 0.75 acres, which included replanting the existing barren corridor with approximately 75 native, balled and burlapped trees. This conceptual plan was submitted to the City of Columbus on April 26, 2017. However, the City subsequently indicated they would not accept the proposed Turkey Run mitigation plan to avoid exacerbating previous concerns regarding flooding in this area.

At the City's direction, OhioHealth was asked to consider mitigation at the City's Anheuser-Busch Sports Park, located at 4990 Olentangy River Road (refer to Figure 2). This park is located approximately 2 miles north of the Administrative Offices site and 1.3 miles north of the North Parking Lot site, in the same watershed as the proposed impacts (HUC12: 05060001-11-03).

The park includes approximately 65 acres between Olentangy River Road and State Route 315. It is composed of baseball fields, parking lots and open grassy areas. Two tributaries to the Olentangy River, Coe Ditch and Bowers Ditch, flow west to east across the property. There are approximately 10 acres of woods on the property, primarily located along the two streams.

In coordination with the City's Department of Recreation and Parks, which operates and maintains the park, the proposed SCPZ mitigation plan included within this variance application includes approximately two (2) acres of riparian corridor enhancement within the woodlot along Coe Ditch, the northern tributary on the site. Please note: it is anticipated the mitigation plan will also compensate for impacts to Slyh Run associated with public roadway improvements to be completed at the Administrative Offices site. For the purpose of the site development projects that are the subject of this variance application, we are proposing to provide up to 1.1 acre of SCPZ enhancements on the park property.







#### 2.3.1 Existing SCPZ Conditions

Coe Ditch has a watershed area of 0.54 square miles and a calculated SCPZ width of 117 feet, which is shown on Sheet 7. Within the existing riparian corridor, both native and invasive vegetation were observed, as summarized in Table 3.

Table 3
Existing Riparian Vegetation at the Anheuser-Busch Sports Park

Common Name	Scientific Name	Classification	
	Trees		
American elm	Ulmus americana	Native	
Black locust	Robinia pseudoacacia	Native	
Black walnut	Juglans nigra	Native	
Eastern cottonwood	Populus deltoides	Native	
Hackberry	Celtis occidentalis	Native	
Honey locust	Gleditsia triacanthos	Native	
Mulberry	Morus spp.	Native	
Tree-of-heaven	Ailanthus altissima	Invasive	
Sycamore	Platanus occidentalis	Native	
	Shrubs		
Bush honeysuckle	Lonicera spp.	Invasive	
	Vines		
Wild grapevine	Vitis spp.	Noxious weed	

The existing canopy is primarily composed of native species. The dominant species observed were black locust, black walnut, and hackberry, with fewer numbers of the other listed species, including invasive tree-of-heaven. The understory is comprised of dense thickets of invasive bush honeysuckle. Moreover, wild grapevine (Vitis spp.), which is a noxious weed, is present throughout the canopy and understory.

#### 2.3.2 Proposed SCPZ Enhancements

The proposed riparian enhancement includes invasive species removal and native plantings. Both bush honeysuckle and tree-of-heaven are highly invasive, and wild grapevine is considered a noxious weed. These species suppress and displace native trees and shrubs with their aggressive growth and dispersal. Moreover, studies have shown that vegetation in riparian zones can have a significant effect on overall stream health. Natural stream vegetation protects against erosion and provides bank stability, provides organic matter, wood and cover for aquatic species, provides nutrient management, and serves as a buffer from nonpoint source pollution. Invasive species, particularly bush honeysuckle, cause direct and indirect impacts to water quality, as listed below:

- 1. Changes in the acidity levels of the soil in the riparian zone;
- 2. Changes in water chemistry and creation of hypoxic conditions due to faster rates of leaf litter decomposition in the stream channel;
- 3. Reduced inputs of organic matter and woody debris needed by aquatic species; and
- 4. Reduced water flow rates due to higher transpiration rates.

The mitigation plan, as shown on Sheets 7 and 8, includes mechanical (cutting) and chemical treatment of these species, followed by planting of native trees and shrubs. The native plantings



will serve to reestablish a diverse and functional understory in the riparian corridor. Similar enhancements have been recently undertaken in this woodlot. The proposed mitigation will complement and expand on these previous restoration efforts. The implementation of the mitigation plan will be coordinated with the Department of Recreation and Parks to determine the most efficient method of completing the stream corridor enhancements.

Approximately 2.2 acres of riparian enhancement are currently being depicted on the mitigation plan. OhioHealth requests that this mitigation be applied to the Type III variance for the Administrative Offices and North Parking Lot SCPZ impacts (as described herein). A future Type III variance to be submitted to the City for public roadway improvements at the Administrative Offices site will also rely wholly or in part on the depicted mitigation. The future SCPZ impacts associated with the public roadway improvements will be more fully described in a forthcoming variance application, but are expected to total approximately one (1) acre. Accordingly, the proposed mitigation has been split into "Section A" (1.1 acres), for the impacts described herein, and "Section B" (1.1 acres), for the potential future impacts.

#### 2.3.3 Proposed SCPZ Mitigation Ratio

The proposed project, i.e., "Section A" shown on Sheet 7, will provide mitigation at an approximate ratio of 1:1 based on acreage. However, the mitigation includes a two-step process of removal of the invasive species from the corridor followed by native plantings. Either one of these activities could be considered a standalone mitigation activity. OhioHealth requests that the City consider the scope of work proposed when evaluating the mitigation proposal.

Moreover, OhioHealth requests that the mitigation ratio of 1:1 be deemed sufficient in this case due to the nature of the impacts to existing paved areas at the two development sites. The mitigation is more than equivalent as it will perform a significantly higher function than the majority of the area impacted, which includes 0.75 acre of existing pavement. Finally, OhioHealth requests that the City consider that onsite mitigation was either deemed infeasible (Slyh Run) or impermissible (Turkey Run).



#### 3.0 STORMWATER BMPS WITHIN THE 100-YEAR FLOODPLAIN

Section 3.1 of the Manual requires that stormwater management BMPs not be constructed within a Federal Emergency Management Agency (FEMA) floodplain boundary. As documented in the Stormwater Management Plan report for the OhioHealth Administrative Office development site, there are two proposed BMPs at least partially located within an area that is currently designated as a Zone AE 100-year floodplain, but is outside of the regulatory floodway. This floodplain is backwater from the Olentangy River. As documented in the Stormwater Management Plan report, and alluded to in this variance application, the proposed project will provide for compensatory floodplain volume, with the total excavation volume within the floodplain exceeding the total fill volume.

The intent is to remove the area, including the stormwater BMPs, from the 100-year floodplain once the fill is placed within that area. This will be accomplished by submitting a Letter of Map Revision, based on fill (LOMR-F) to the City for review and approval, and then to FEMA. By obtaining the LOMR-F, the project will be in compliance with the Manual.

The City has suggested that a Conditional LOMR-F be obtained as part of the plan approval process. The Conditional LOMR-F would confirm the proposed floodplain fill meets both the City's and FEMA's criteria for an exclusion from the 100-year floodplain. We have indicated that a Conditional LOMR-F is not necessary for the reasons described below.

- Both the City's and FEMA's standards allow fill to be placed within a designated 100-year floodplain as long as the fill does not encroach into the regulatory floodway and meets other specific requirements related to fill compaction, the Endangered Species Act (ESA) and standards for Reasonably Safe from Flooding.
- Where site improvements are being proposed within the 100-year floodplain, such as streets, buildings, etc., the City's floodplain regulations require conformance with specific design standards and a demonstration that the proposed project will be Reasonably Safe from Flooding. Under these circumstances, the City does not require that a CLOMR-F be issued prior to approving the site plan and allowing the floodplain fill and associated site improvements to occur.
- Once the floodplain fill is placed at the OhioHealth Administrative Offices site, then a LOMR-F application is submitted for the City's review and approval and then to FEMA for their approval. The City's review of the LOMR-F application accounts for all of the design requirements referenced above and ensures the project meets all relevant standards before it is submitted to FEMA. At this point, with almost absolute certainty, the LOMR-F will be issued by FEMA upon the completion of their review.
- In the case of proposed stormwater BMPs being placed within the 100-year floodplain at the OhioHealth Administrative Offices site, the site plans will address the City's requirements for floodplain fill and conformance with the applicable regulations. This will allow the City to determine that the floodplain fill activity meets both local and federal standards and will be eligible for a LOMR-F once the fill is placed.



A LOMR-F application will be filed with the City once the floodplain fill is completed. This
process is consistent with the process followed by the City when other infrastructure
improvements occur within a designated floodplain; therefore, the City does not need to
apply a higher standard to ensure the requirements of both the Manual and the
floodplain regulations are both met for this project.

Based on our knowledge of the local and federal floodplain regulations, and our understanding of the City's process for approving site development projects involving floodplain fill, we believe a Conditional LOMR-F is not necessary to accomplish the end goal of removing the stormwater BMPs from the 100-year floodplain. With the understanding that the project will follow the steps required by the City and FEMA to remove infrastructure from the floodplain via a LOMR-F, then we also believe the proposed project complies with the Manual.



#### 4.0 CONCLUSIONS

OhioHealth respectfully requests approval of the Type III variance for the Preferred Project Alternative for both the Administrative Offices and North Parking Lot projects. The proposed impact to 0.597 acre of Slyh Run SCPZ at the Administrative Offices site is at least partially driven by the requirement to provide compensatory floodplain storage volume, as required by Section 1.4 of the Manual. The Preferred Alternative results in a net gain of 0.143 acre of pervious surface within the SCPZ.

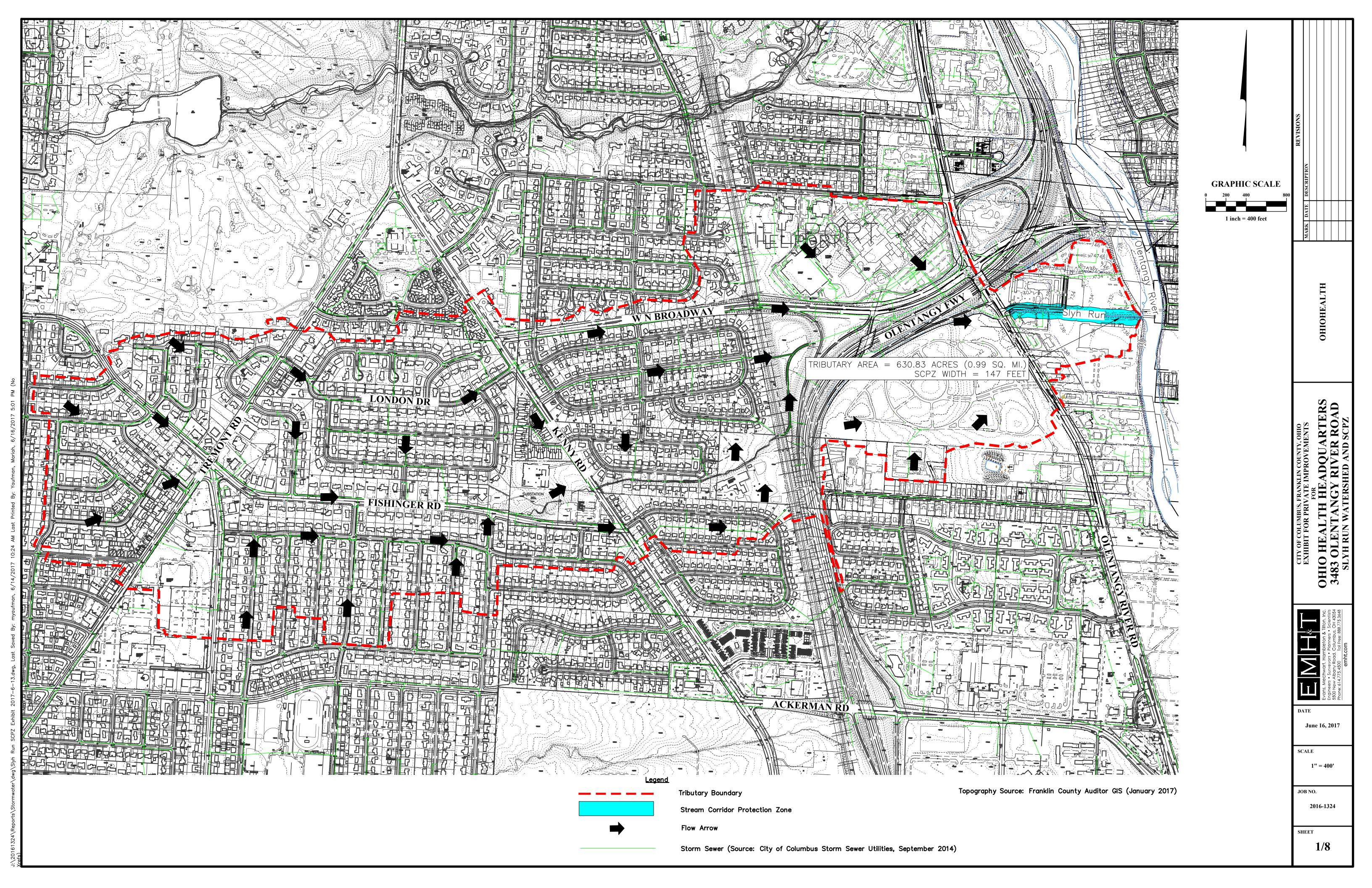
The 0.311-acre encroachment within the Turkey Run SCPZ is necessary in order to optimize the available parking on the site, and improve the skewed intersection condition at McConnell Drive. The Preferred Alternative impact results in a net gain of 0.125 acre of impervious surface.

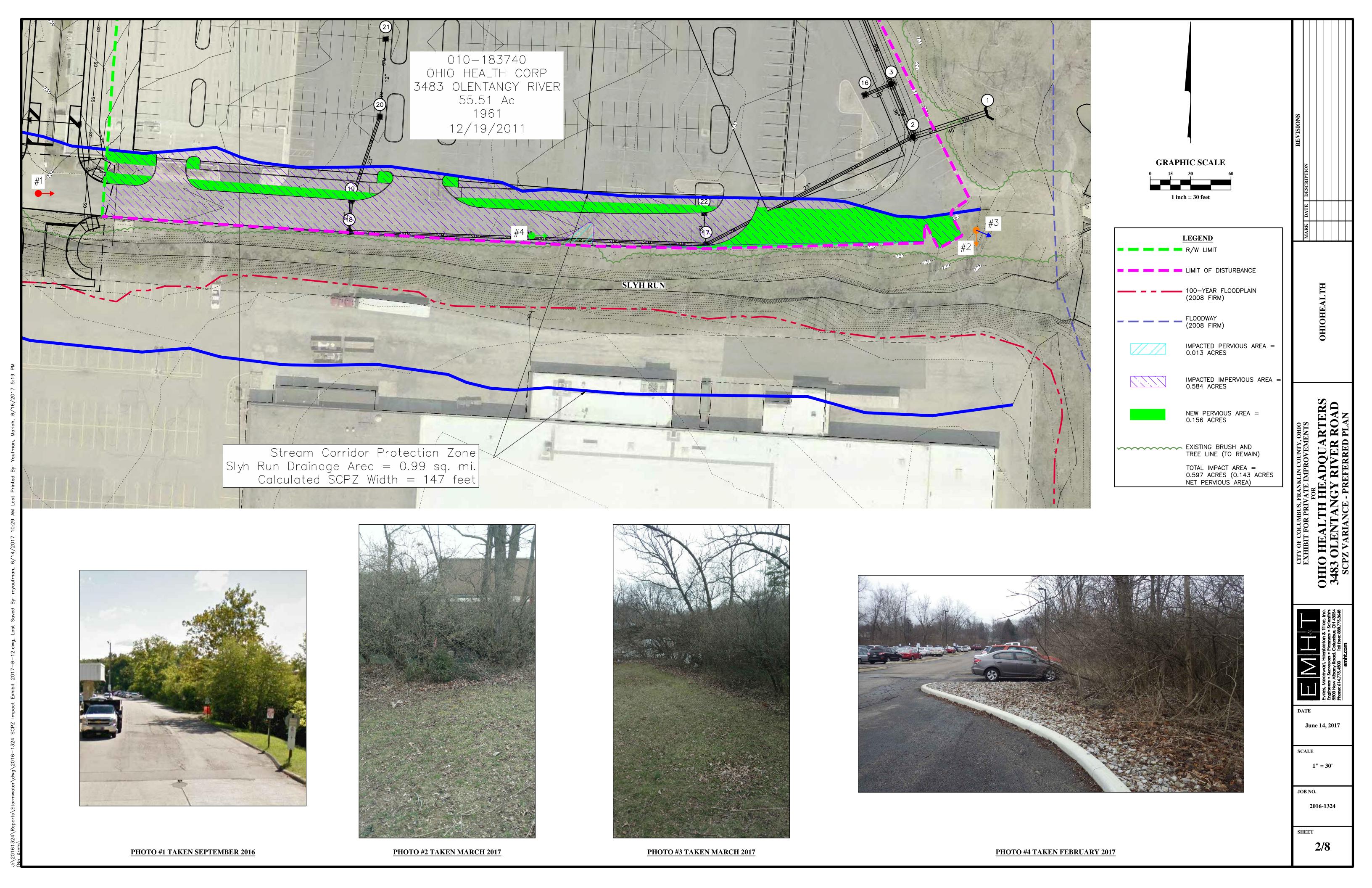
The mitigation proposed for these impacts includes approximately 1.1 acres of forested riparian corridor enhancement at the Anheuser-Busch Sports Park, including invasive species removal and native plantings. This provides a mitigation ratio of approximately 1:1.2 for the overall impacts (0.908 acre). However, the majority of these impacts (0.75 acre) will affect existing pavement. Considering just the impacts to pervious surface within the SCPZs (0.158 acre), the mitigation represents a ratio of nearly 1:7. The mitigation is more than equivalent as it will perform a significantly higher function than the area impacted.

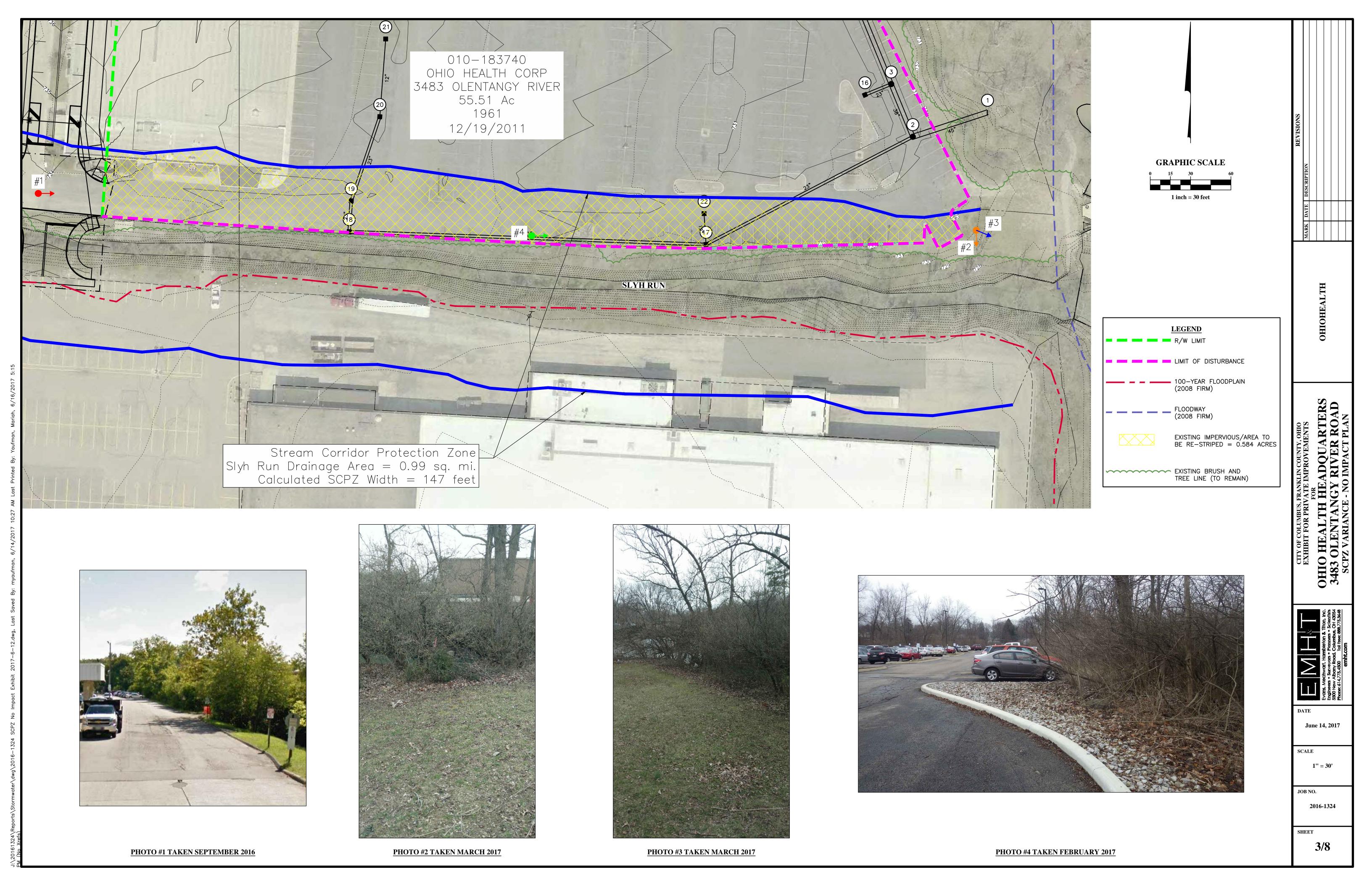
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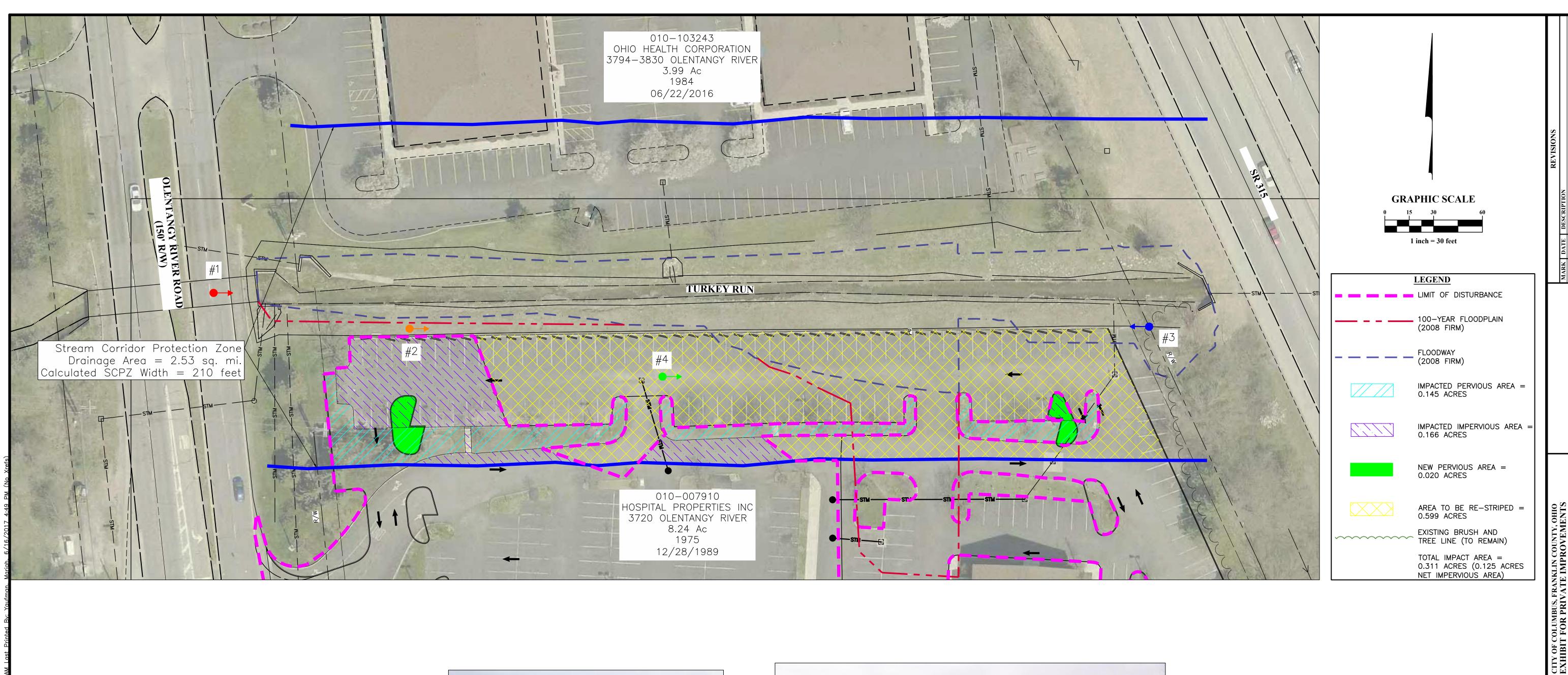
# **EXHIBITS**



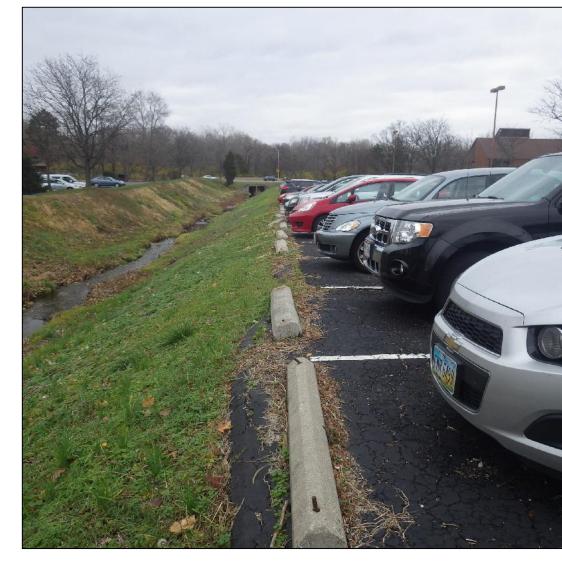


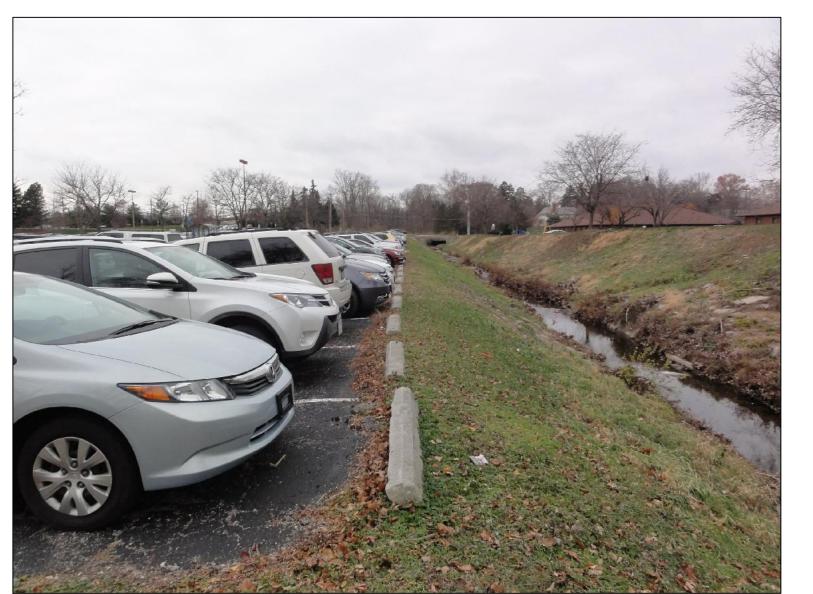










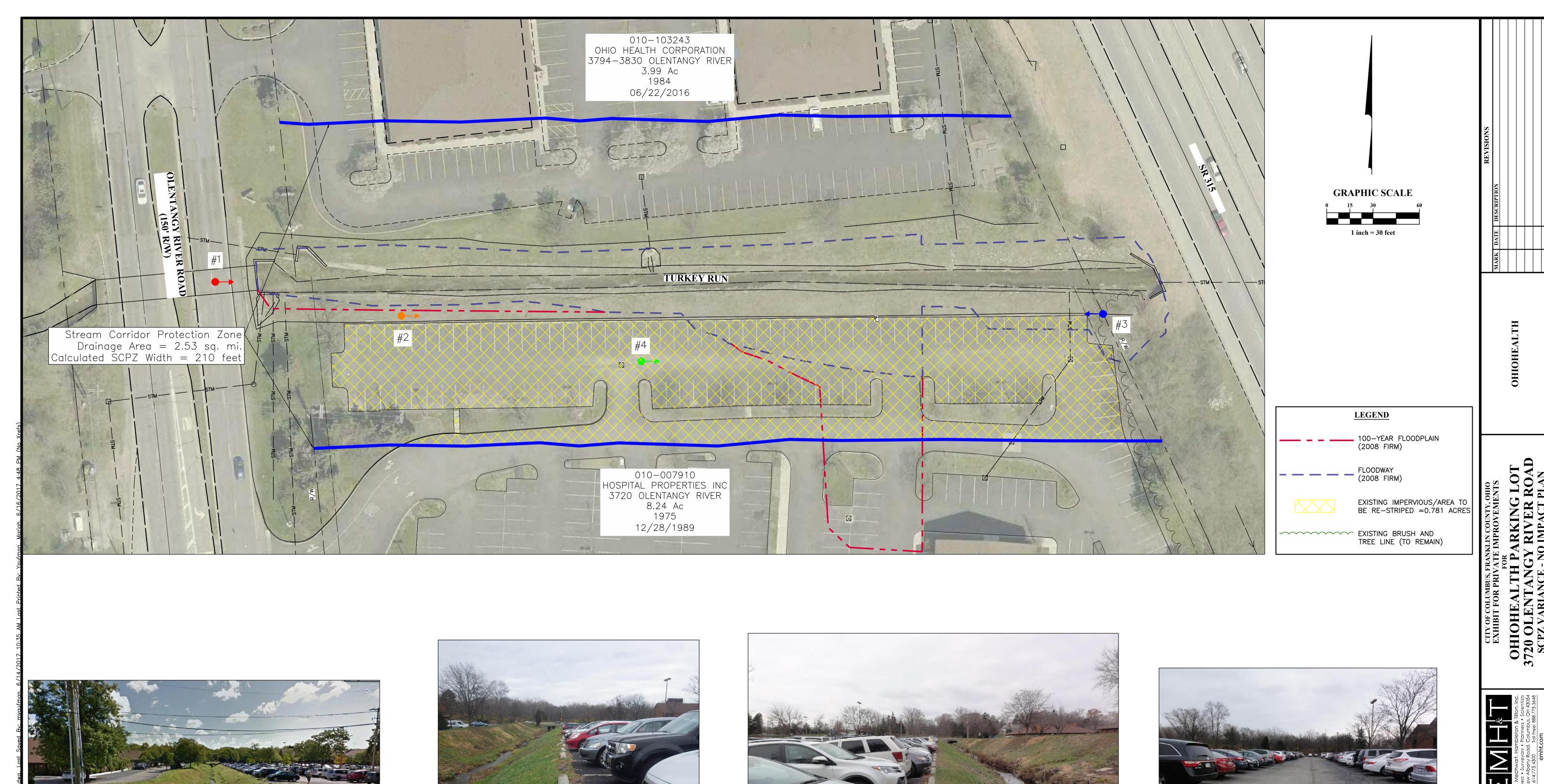




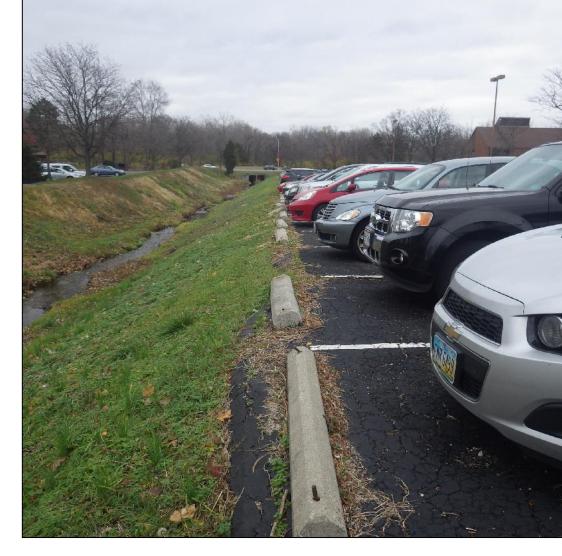
June 16, 2017

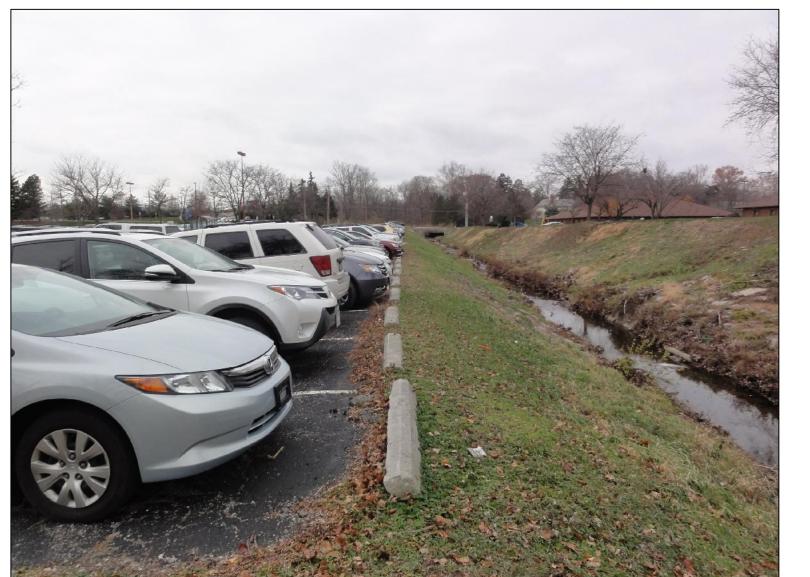
SCALE

JOB NO.











June 16, 2017

SCALE

JOB NO.

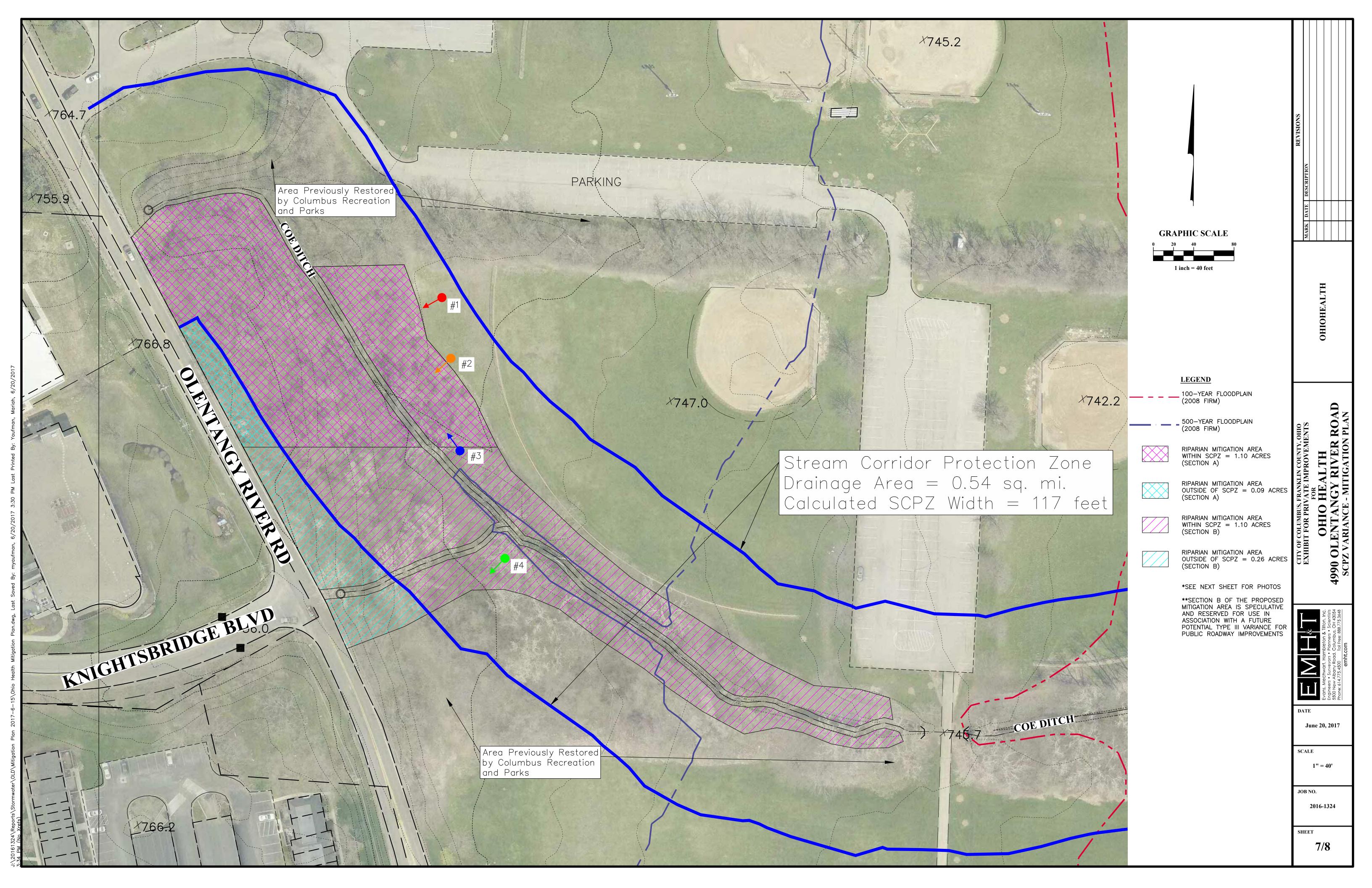


PHOTO #4 TAKEN JUNE 15, 2017 HONEYSUCKLE UNDERSTORY



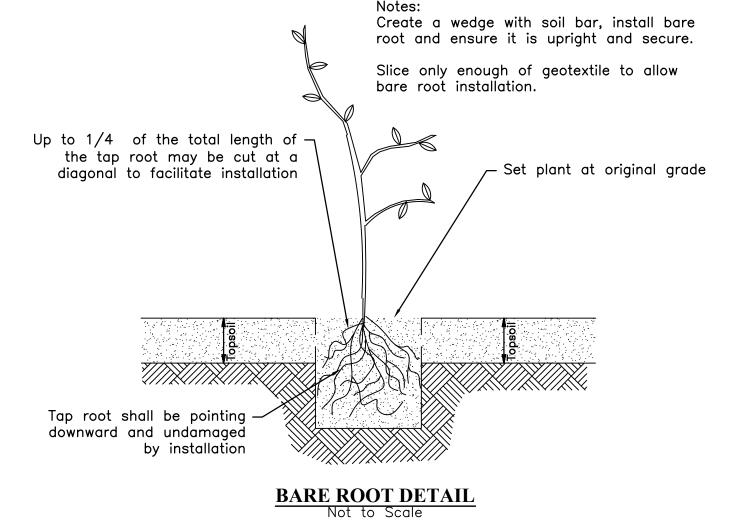
**PHOTO #2 TAKEN JUNE 15, 2017** INVASIVE TREE-OF-HEAVEN



PHOTO #3 TAKEN JUNE 15, 2017 GRAPEVINE



POST-RESTORATION EXAMPLE (NO LOCATION ON EXHIBIT)



	PLANTING TA	BLE		
COMMON NAME	SCIENTIFIC NAME	QUANTITY	MATERIAL	SIZE
	TREES	•		
RED OAK	QUERCUS RUBRA	400	BARE ROOT	18"
AMERICAN SYCAMORE	PLATANUS OCCIDENTALIS	400	BARE ROOT	18"
EASTERN COTTONWOOD	POPULUS DELTOIDES	400	BARE ROOT	18"
OAK (S)	QUERCUS SPP.	100	BARE ROOT	18"
BLACK CHERRY*	PRUNUS SEROTINA	100	BARE ROOT	18"
	SHRUBS			
GRAY DOGWOOD	CORNUS RACEMOSA	300	BARE ROOT	18"
ARROWWOOD VIBURNUM	VIBURNUM DENTATUM	300	BARE ROOT	18"

 <sup>\*</sup> Acceptable substitutes:
 Easternredbud (Cercis canadensis)
 Honey locust (thornless) (Gleditsia triaconthos 'inermis')

# **INVASIVE SPECIES REMOVAL**

All invasive bush honeysuckle shrubs (Lonicera sp.) and Tree—of—Heaven (ailanthus altissima) saplings and trees within the areas indicated on the exhibit shall be cut near to the ground by hand, leaving a low stump (1—2 inches high). In addition, all grape vines will be traced to area(s) rooted into the ground and cut on both sides of the vine where it is rooted into the ground. No mechanized clearing or grubbing should occur. Remove and dipose of cut material off—site.

Apply water—based glyphosate herbicide (trade name Rodeo, Accord, or approved equal) to the cut surface of shrubs, trees, and vines immediately (within three (3) minutes) after cutting. Apply at least 20% of active ingredient, however a 100 percent solution is recommended for best results, following specifications given on the product label. Application using a hand—held or backpack sprayer, or paintbrush, is advised. Care should be taken not to apply herbicide to adjacent native vegetation.

OHIOHEALTH



June 16, 2017

SCALE

JOB NO.

2016-1324

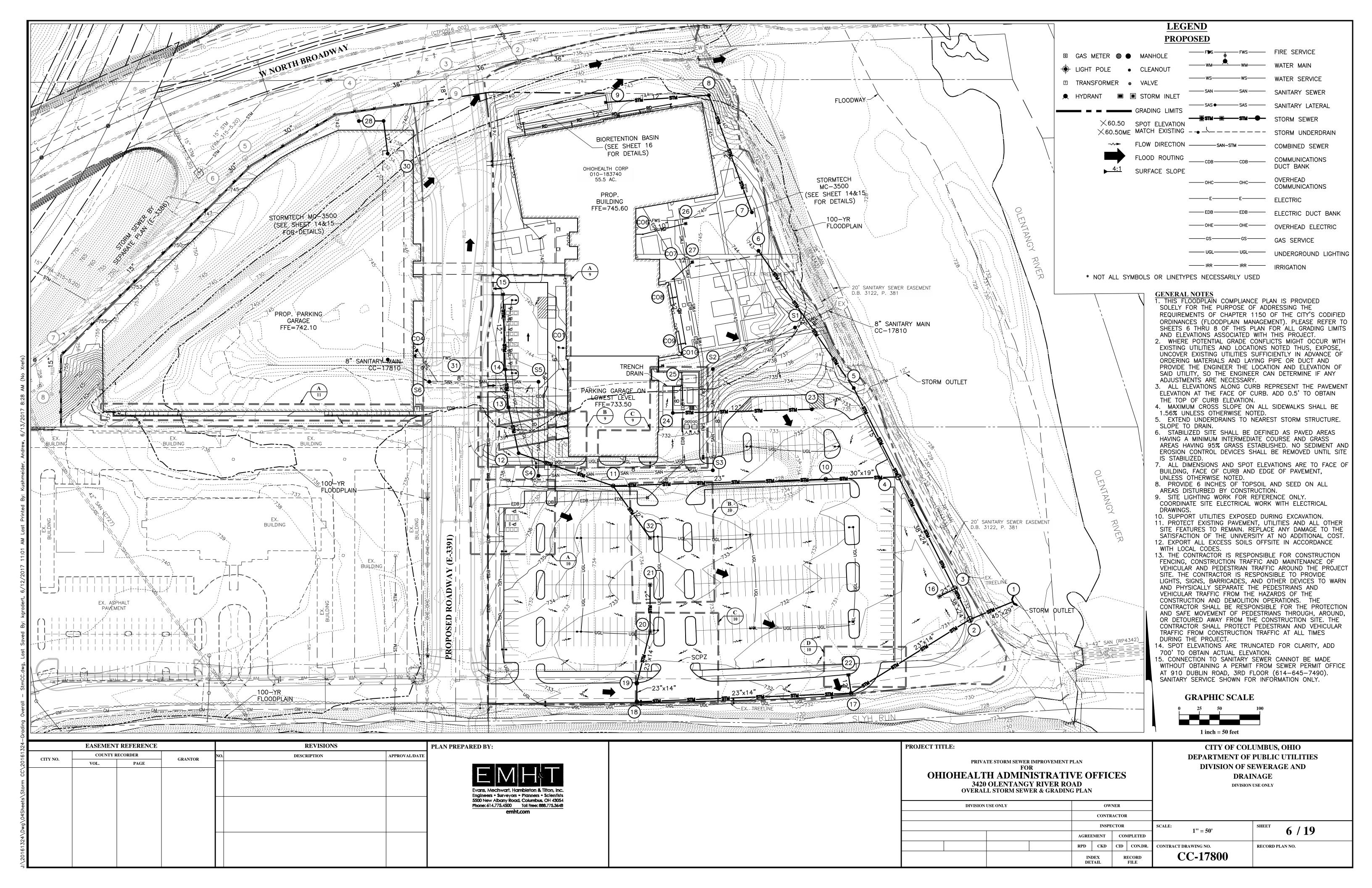
As Noted

SHEET

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# **APPENDIX A**





# **APPENDIX B**

