

OhioHealth Administrative Offices and North Parking Lot Development

Stormwater Drainage Manual Type 3 Variance Application COMMENTS (dated June 21, 2017)

As the local watershed group, the Friends of the Lower Olentangy Watershed (FLOW) have been actively working on the restoration of both Slyh and Turkey Runs. FLOW has also reached out directly to OhioHealth (as a significant landowner in these sub-watersheds) but we were unaware of the proposed floodplain filling discussed in the stormwater manual variance request when we spoke to them. We have previously discussed with OhioHealth our preference for on-site mitigation.

1. The Friends of the Lower Olentangy Watershed (FLOW) have reviewed the request for a variance and find it to be unresponsive to the needs of the Olentangy Watershed. While we are supportive of the compilation of the OhioHealth employees for the efficiency they require, we do not support the impacts to the watershed. Specifically, we are concerned about the filling in the 100 year floodplain (Section 3.0). **We request information on the volume of floodplain fill and where the compensatory volume will be provided before authorization is given for this project. How will this proposed project impact flooding of other local and downstream landowners?**

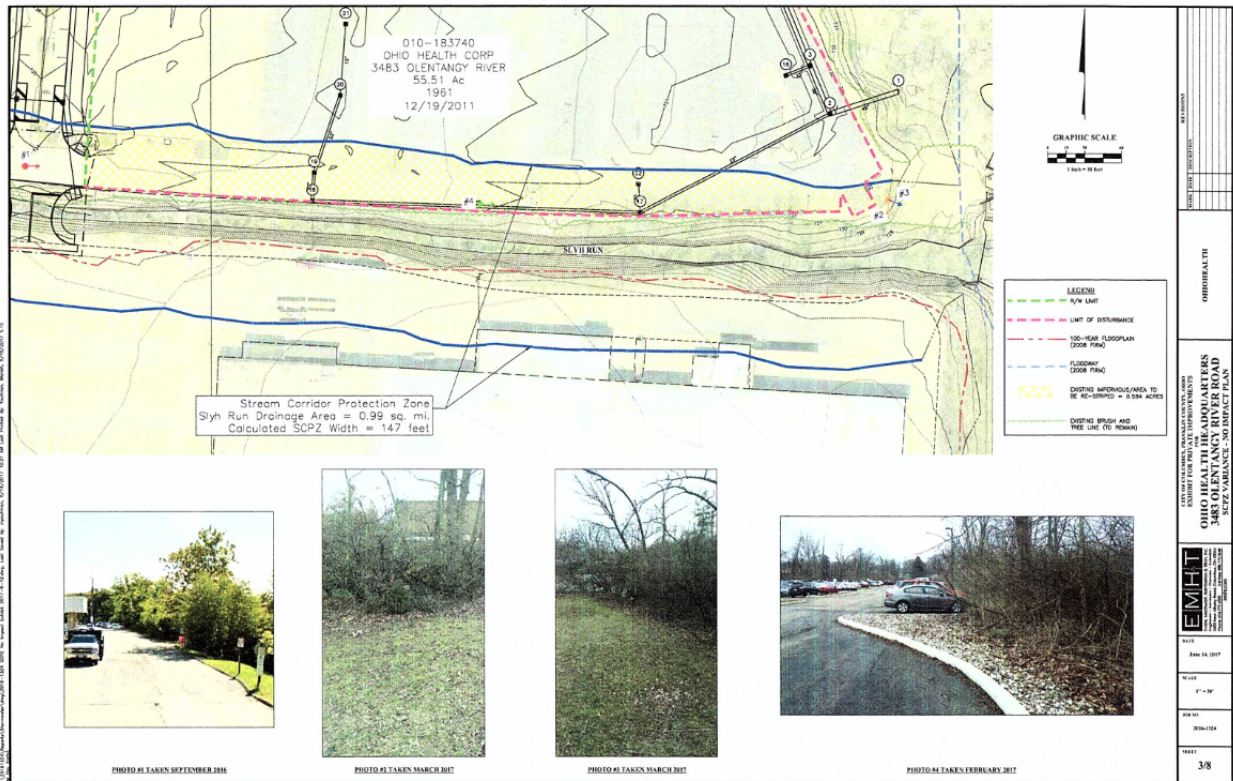


OhioHealth 100 year floodplain (FEMA FIRM)

2. FLOW requests that **all the treed areas in the parking lots at both sites be sunken with incomplete curbs so that they can receive stormwater. We also requests that native canopy trees be planted. How many parking spaces will be provided and how many trees will be installed?**

3. What is the impact to Slyh Run from the proposed Stream Corridor Protection Zone impacts? Per Section 2.1.1, the applicant is proposing to lower the existing paved areas to provide the compensatory floodplain. How deep will the water be in the parking lot during a 10 yr., 25yr, 50yr and 100 yr. storm? Will there be damage to cars from this approach that may result in lowering the water quality?

4. The Stream Corridor Protection Zone shown on Sheet 3 of 8 does not appear to be centered equally on both sides of the stream. The majority of the SCPZ appears to be on the south side of the stream. FLOW would like clarification on how this area was calculated.



5. Section 2.1.3- The applicant is proposing to impact 0.013 acres of pervious area in the Slyh Run Stream Corridor Protection Zone. **We request clarification before any impacts are authorized.**

6. Turkey Run Stream Corridor Protection Zone Impacts. It is not clear from Sheet 5 of 8 why an additional 0.125 acres of pervious impacts to the SCPZ are required for parking! **FLOW requests that the city approve the No Impact Alternative unless the actual mitigation is conducted on-site as proposed below.** Our concern is that under the Preferred Alternative there is actually a loss of 0.145 acres of existing pervious area. The proposed new 0.02 acres of new pervious area appears to be for new tree wells. Are the proposed new pervious areas for the parking lot tree requirement? Does the City always consider the pervious area provided by each tree for every 10 spaces of parking?

7. FLOW is aware of the Settlement with the Annadale/Martindale Neighborhood as a result of the flooding of 1989. We are concerned that the city is using a 28 year old study to prevent the applicant from conducting mitigation along Turkey Run. We request that before this prohibition continues that an updated study be conducted. The current prohibition is preventing the connection of 2 high quality areas: The Olentangy River and Turkey Run west of Olentangy River Rd. At a minimum, there is nothing in the study that should prevent the applicant from planting canopy trees along the terrace of Turkey Run.

8. Since OhioHealth owns the area north of Turkey Run and there is some parking there, FLOW requests that the city consider this when evaluating their request for a variance of the SCPZ. We realize that the

cost of creating parking garages is high and that surface lots are cheap, but streams should not be jeopardized solely for economic reasons.

9. If the City decides to approve the SCPZ request, then FLOW requests that mitigation be provided along Turkey Run (and not at Anheuser-Busch Sports Park). We request that the applicant excavate floodplain along Turkey Run to increase the conveyance capacity. Per a study by OSU students (2014), the stream corridor in this area already has the capacity to carry a 50 year storm.

10. FLOW objects to the proposal to conduct mitigation at Anheuser-Busch Sports Park and at the reduced rate of 1:1. Our preference concurs with the SCPZ mitigation strategy to have the mitigation along the same waterways that are impacted. Our first preference is for mitigation on Turkey Run, to increase the in-channel storage capacity via excavation and our 2nd preference is to provide tree canopy to Turkey Run and Slyh Run (after the removal of invasive bush honeysuckle).

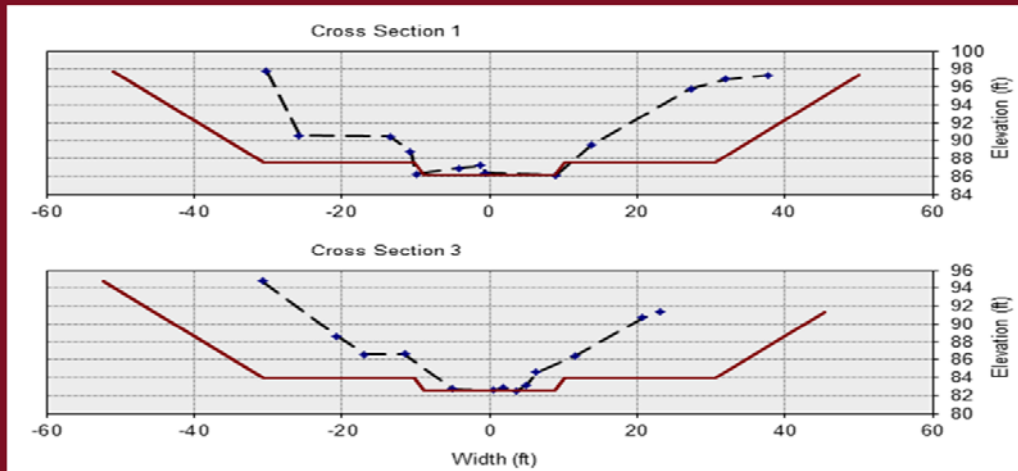
11. FLOW requests that the city consider that the applicant has indicated that there will be a future Type 3 variance request for the related public roadway improvement projects!!!! FLOW has additional concerns about more impacts with deminimus mitigation at Anheuser Busch Sports Park which is only 1.46 acres (a ratio of 1:1 instead of the required 1:2). The applicant is requesting that they provide 1:1 mitigation. FLOW suggests that the invasive species removal and replanting is something that the city already has the capacity to conduct via their Columbus Ecological Restoration Program. Only OhioHealth can conduct mitigation at Slyh Run and Turkey Run. If it does not happen via this project, it will not ever happen. Is the plan to provide cash to Columbus Recreation and Parks Department to conduct the mitigation?

12. Section 3.0- There is no discussion of the amount of floodplain fill proposed or how the applicant can provide the compensatory volume. It appears that there will be an underground garage (Elevation 733.5 ft.) and that the floodplain elevation is 735 ft. Is this where the floodplain storage will be? Is this acceptable to the City? Does the city consider this **a stormwater BMP in the floodplain?**

13. New pervious area along Slyh Run (Sheet 2 of 8). FLOW requests that this 0.156 acres be planted with native riparian trees and shrubs (not turf grass) to help improve the water quality of the corridor.

Proposed Design

220,094 cu. ft. to be excavated



Dotted lines are current cross section and solid lines are proposed channel dimensions

Turkey Run East of Olentangy River Rd's existing (blue) and proposed (red) Cross Sections

Cost of Ditch



- Based on costs of \$2 per cubic yard of excavation suggested by The Nature Conservancy
- Estimated 8,151 cubic yards to be excavated
 - Total Cost: ~\$16,000.

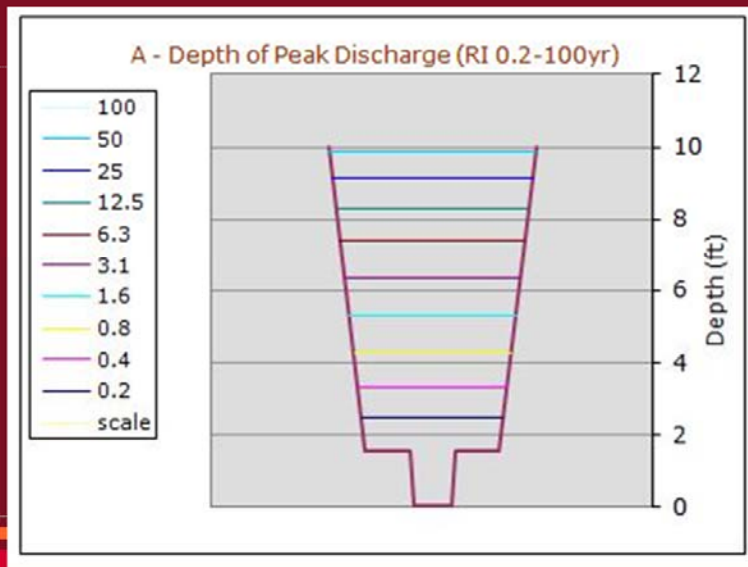
Estimated Cost for Mitigation at Turkey Run

Our Suggestions:

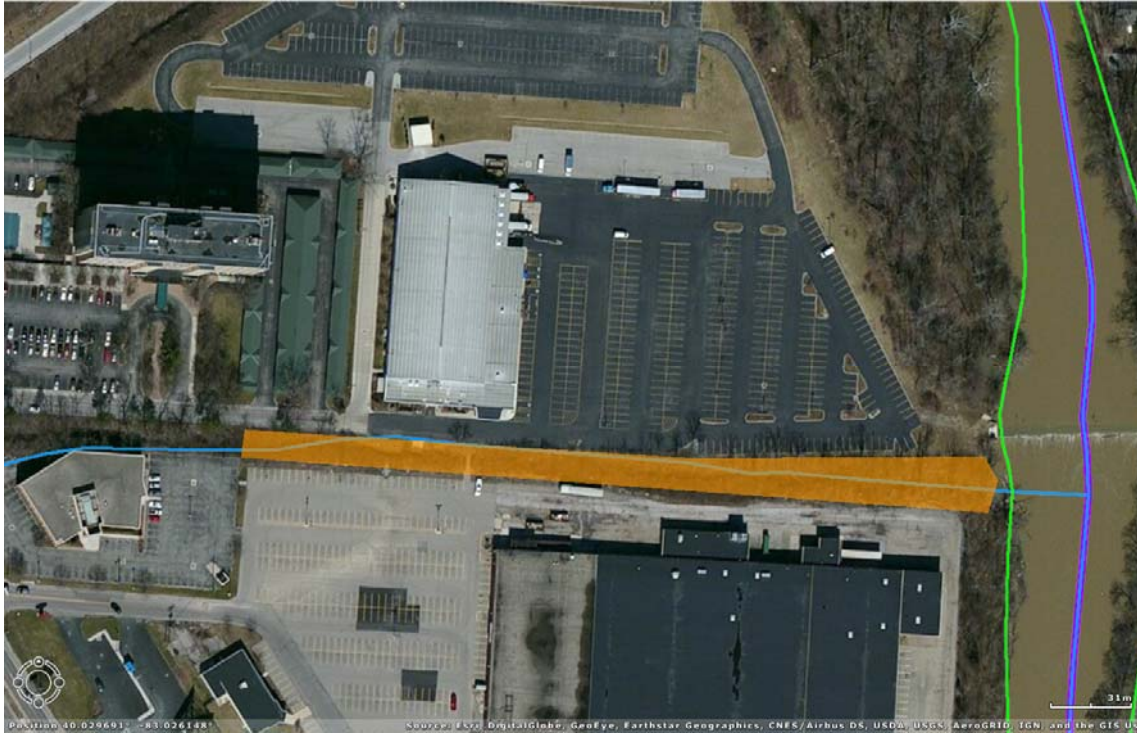
Proceed with constructing a two-stage ditch between Olentangy River Road and OH-315 to connect two quality ecological habitats.

Recommendation by OSU Students for Turkey Run

Will it be effective?

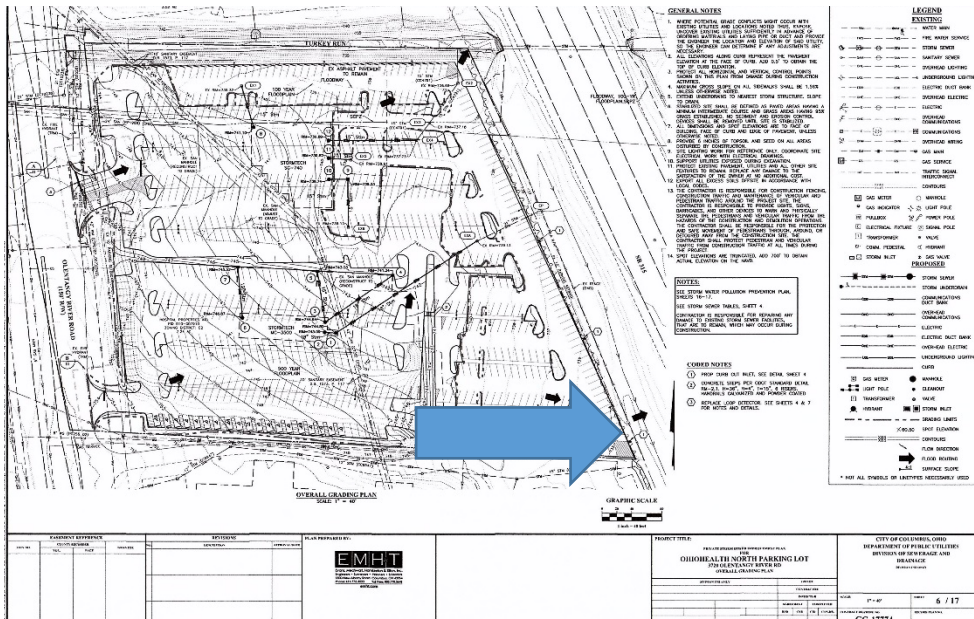


Turkey Run Conveyance Improvements will be effective at conveying the 50 year storm.



Slyh Run- approximate 1 acre Stream Corridor Protection Zone Honeysuckle Removal and Tree Planting area (shown in orange).

14. Per Sheet 6/17, how will the flood routing for the Turkey Run (North Parking Lot) affect safety on SR 315? Will the flooding result in sheet flow across SR 315 shown by the blue arrow below?



15. Please provide responses to the FLOW Science Committee, Attention Laura Fay at Lfay9785@columbus.rr.com