

Mr. Greg Fedner
Department of Public Utilities
gfedner@columbus.gov
StormVariance@columbus.gov

RE: Whetstone Park Type 3 Stream Corridor Protection Zone (SCPZ) Variance Request
Comments

Dear Greg:

FLOW is requesting additional information before this variance is decided.

The image below depicts the USGS StreamStats subwatershed basin for the small stream just south of the Project Area in Whetstone Park. StreamStats is often inaccurate in urban areas. Can you calculate the SCPZ based on the sewershed please?



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Basin Characteristics

Parameter Code	Parameter Description	Value	Unit
CSL1085LFP	Change in elevation divided by length between points 10 and 85 percent of distance along the longest flow path to the basin divide, LFP from 2D grid	91.8	feet per mi
DRNAREA	Area that drains to a point on a stream	0.11	square miles
LC92STOR	Percentage of water bodies and wetlands determined from the NLCD	1.63	percent
OHREGA	Ohio Region A Indicator	1	dimensionless
OHREGC	Ohio Region C Indicator	0	dimensionless

Peak-Flow Statistics

Peak-Flow Statistics Parameters [Peak Flow Full Model Reg A SIR2019 5018]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	0.11	square miles	0.04	5989
OHREGC	Ohio Region C Indicator 1 if in C else 0	0	dimensionless	0	1
OHREGA	Ohio Region A Indicator 1 if in A else 0	1	dimensionless	0	1
CSL1085LFP	Stream Slope 10 and 85 Longest Flow Path	91.8	feet per mi	1.53	516
LC92STOR	Percent Storage from NLCD1992	1.63	percent	0	25.35

Peak-Flow Statistics Flow Report [Peak Flow Full Model Reg A SIR2019 5018]

PIL: Lower 90% Prediction Interval, PIU: Upper 90% Prediction Interval, ASEp: Average Standard Error of Prediction, SE: Standard Error (other -- see report)

Statistic	Value	Unit	PIL	PIU	ASEp
50-percent AEP flood	20.4	ft ³ /s	10.7	38.8	40.1
20-percent AEP flood	37.9	ft ³ /s	20.8	69	37.2
10-percent AEP flood	52.4	ft ³ /s	28.6	96.1	37.6
4-percent AEP flood	74	ft ³ /s	40	137	38.1
2-percent AEP flood	92.2	ft ³ /s	49.3	172	37.8
1-percent AEP flood	112	ft ³ /s	59.2	212	39.6

According to USGS' Stream Stats, the small stream and pond south of the project area have a drainage basin of 0.11 acres (a minimum of 24 FT SCPZ). Has the applicant taken this into account in the exhibit drawings? Has the pond been include in the SCPZ? **The small stream to the south has a minimum SCPZ width of 50 ft. per SWDM 1.3.1, and, therefore, is outside the limits of the project. Columbus DOSD does not apply SCPZ requirements to ponds.**

The exhibits provided by the applicant are not detailed enough to evaluate the impacts in this important floodplain area. What construction will occur to provide drainage and irrigation? Will the infiltration that currently exists be decreased because of equipment compaction? Please provide exhibits that provide details on acreage of impacts, types of impacts, information on staging areas etc.

Per the applicant: The goal of the project is to increase the infiltration of stormwater to allow for improved playability of the fields. It is proposed to utilize sand slit drainage within

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the field area (4.21 acres) to provide faster infiltration, which leads to fewer cancellations, better field playability and less wear. Sand slit drainage is the process of adding 1" wide x 6"-9" deep slits of sand into the soils which allow surface water to penetrate the ground at a faster rate.

See Exhibit B. Drainage and irrigation are proposed within the field area. Irrigation will tie into the existing Whetstone Pond and include a main stub to the south for future southern field expansion. The irrigation control and main valve will be located approximately 30' from the pond edge and outside of the floodway/SCPZ. Drainage will connect to the stormwater outfall. Both drainage and irrigation are minimal impact with trenching beyond the grading limits.

Staging is proposed to take place within the grading limits and/or on the existing impervious parking lot south of Whetstone Pond to reduce the impact to the existing area. The existing trail/walkway is the path that is intended for construction to travel between the staging and construction site.

FLOW requests that the city comply with the new Public Tree Code ordinance that requires mitigation that requires replacement of every trunk inch of canopy lost to be replaced with an inch. FLOW is requesting detail on the DPH size of the trees to be removed and clarification why these removals are necessary. According to our understanding of the Minimal Impact narrative 8" of trees will be removed and only 5 inches replaced, with a loss of 3 inches caliper. This does not comply with our understanding of Minimal Impact. Per the applicant, two 4-inch trees will need to be removed due to the EPA mandated temporary sediment basin. Plans were completed prior to the passing of the new tree code. Tree replacement will be updated per code with a minimum of 8 inches of replacement tree caliper.

FLOW is also requesting details on the Ohio Floodplain Native Seed Mix proposed. Please provide species names.

Per the Applicant:

Per the OPN website, the below species are included in the mix.

Grass and Grasslike:

Elymus virginicus - Virginia Wild Rye

Elymus canadensis - Nodding Wild Rye

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Andropogon gerardii - Big Bluestem

Panicum (Dichanthelium) clandestinum - Deer-Tongue Grass

Elymus riparius - Riverbank Wild Rye

Carex grayi - Gray's Sedge

Carex frankii - Frank's Sedge

Scirpus atrovirens - Dark Green Bulrush

Glyceria grandis - Reed Manna Grass / American Manna Grass

Scirpus cyperinus - Woolgrass

Wildflowers:

Verbena hastata - Blue Vervain

Senna hebecarpa - Wild Senna

Bidens aristosa - Tickseed Sunflower

Asclepias incarnata - Swamp Milkweed

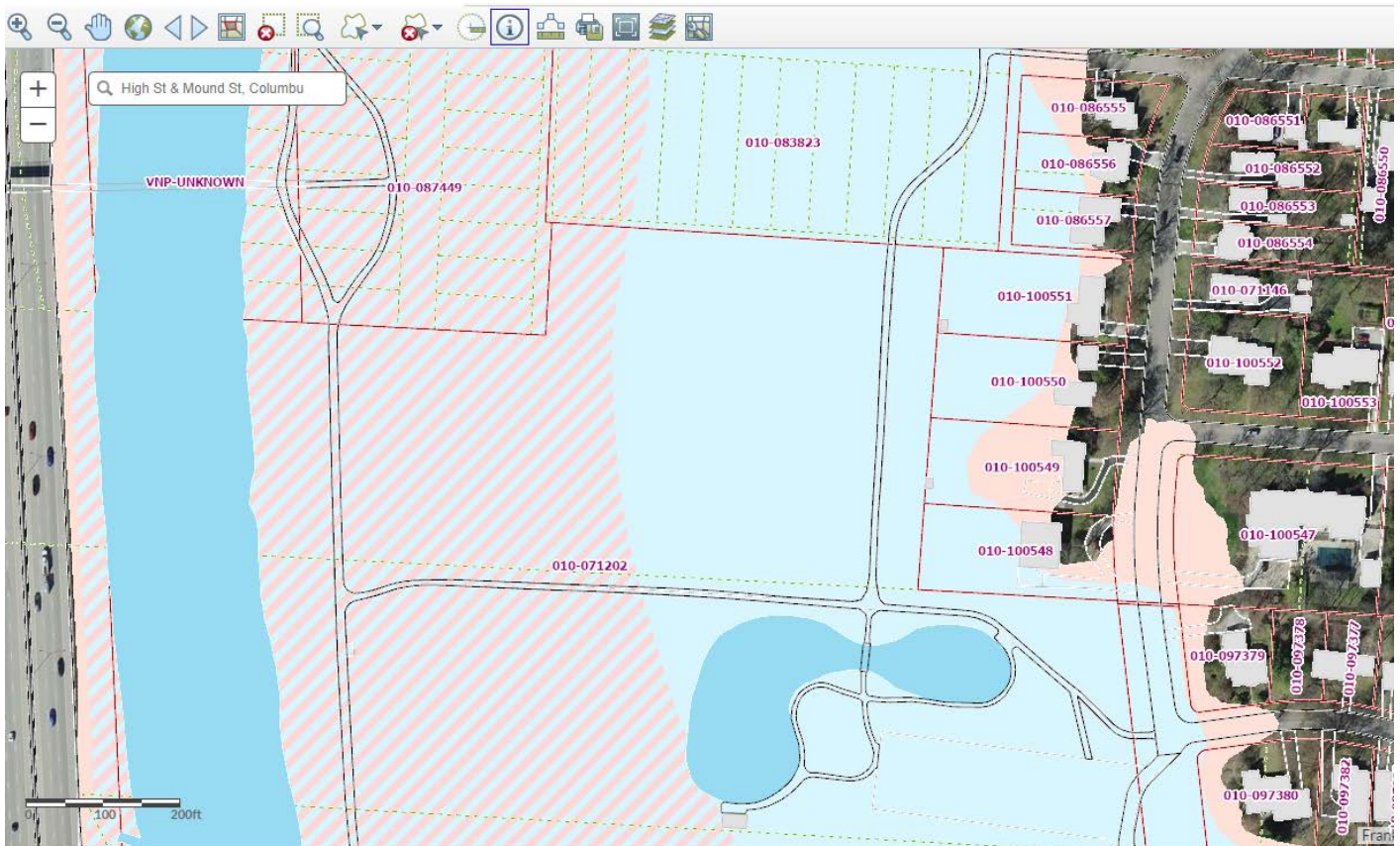
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Rudbeckia laciniata - Green-headed Coneflower
Verbena stricta - Hoary Vervain
Eupatorium fistulosum - Hollow Joe Pye
Vernonia fasciculata - Prairie Ironweed
Actinomeris alternifolia - Wingstem
Solidago ulmifolia - Elmleaf Goldenrod
Mimulus ringens - Monkey Flower
Lobelia cardinalis - Cardinal Flower
Pycnanthemum tenuifolium - Narrow Leaved Mountain Mint
Thalictrum dasycarpum - Purple Meadow Rue
Aster novae-angliae - New England Aster

We also wonder about the claim that this mitigation area will encourage pollinator habitat. Please provide details.

Per the Applicant:

The current area is lawn, that has little support for pollinators. The Ohio Floodplain Native Seed Mix contains native grasses and perennials that will attract a greater number of pollinators to the area by providing an increase in sufficient foods and habitat.



Sincerely,
Laura Fay

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FLOW

Friends of the Lower Olentangy Watershed

Laura Fay
FLOW Science Committee Chair

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