

January 23, 2024

Angela Short, PLA
Project Manager
GPD Group
1801 Watermark Drive, Suite 210
Columbus, OH 43215

RE: Stormwater Drainage Manual (SWDM) Type III Variance Request – Whetstone Sports Field Improvements, CC-20178

Ms. Short:

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 within the SCPZ. A variance is requested to allow repairs and improvements to the existing Whetstone Park soccer fields within the Olentangy River Stream Corridor Protection Zone. The proposed project will elevate the existing fields and improve drainage and irrigation of the playing surface area within the Olentangy River floodway/SCPZ.

The request was submitted to the City on December 20, 2023. As part of the Variance review process, the subject Variance request was posted on the City website on December 27, 2023 to solicit public comments. Public comments from FLOW were received on December 31, 2023. The Variance Review Committee reviewed the subject Variance Request and public comments on January 10, 2024.

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 – Due to the size of the soccer fields within the SCPZ, and the goal of the project, the Full Compliance alternative would eliminate the project and no field improvements would be pursued.
- Minimal Impact Alternative – The minimal impact plan creates three (3) distinct large field areas with shallow swales between them to convey the water away from the fields and to the south of the site into catch basins. Per the National Federations of State High School Associations, natural turf fields with a sub-surface drain system should be sloped no less than one (1.0%) percent. Overall, the project proposes to lift the grade to the north approximately 12-inches and provide a 1.4% crowned



slope across the fields with underdrains running parallel to the fields. The fields will maintain a lawn condition but will be planted with a more robust and durable seed type commonly used for sports fields.

Once construction is finished and the lawn is established, the fields will exhibit increased resilience for typical to large storm events and normal wear. The enhanced drainage will decrease the instances of game cancellations due to localized flooding, and the use of a more durable seed type will result in better turf recovery.

- Preferred Alternative - The preferred plan for the sports field improvements would be similar to the minimal impact plan, with a portion of the disturbed area being seeded with a native seed mix to support the natural hydrologic processes. Due to the EPA requirement of a temporary sediment basin, an area of approx. 16,000 square feet provides an opportunity to establish a native seeded area outside of the turfed sports fields. In addition to the more resilient fields, this plan would provide increased biodiversity, encourage pollinator habitat, and support stormwater infiltration within the native seeded area.

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 mitigation plan represents the owner's team'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 Alternative will eliminate the project, depriving park and sports fields' users of much needed functional improvements.

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 an SCPZ mitigation plan as conceptually described in the variance application and in the applicant's response to the FLOW comments.

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
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