

Navigating Local Regulations for Effective Design

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UNION CEMETERY

Presentation Outline

- Project Overview
- Stream Impact Mitigation
- Stormwater BMP Design
- Design Challenges
 - Project Schedule
 - Layered Regulations
 - Location
 - Quantity v. Quality
 - Maintenance

Project Overview

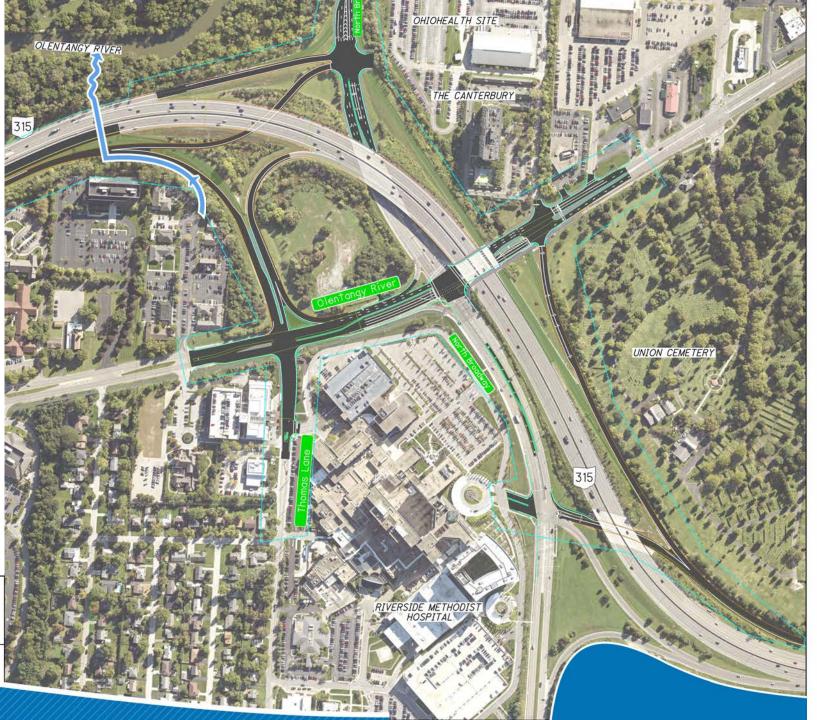
- City of Columbus /Ohio Health partnership
- Accommodate new Ohio Health corporate center
- Major improvements to SR 315/Olentangy River Rd/N. Broadway interchange
- New SB exit ramp direct to N. Broadway
- Portions of project in ODOT LA/ROW
- Aggressive schedule

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SR 315 AND NORTH BROADWAY INTERCHANGE IMPROVEMENTS PROJECT AREA MAP

THE CITY OF

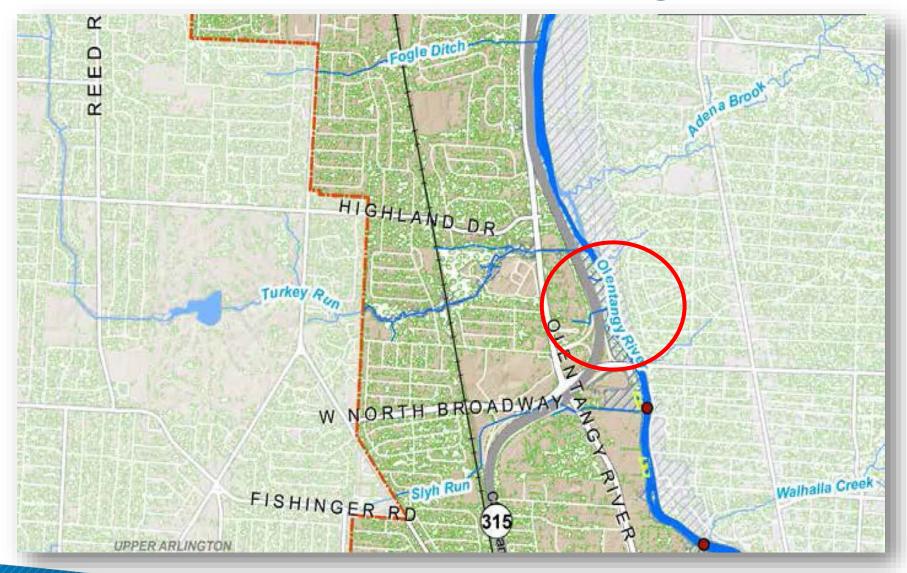
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Stream Impact Mitigation

Unnamed Tributary to Olentangy River



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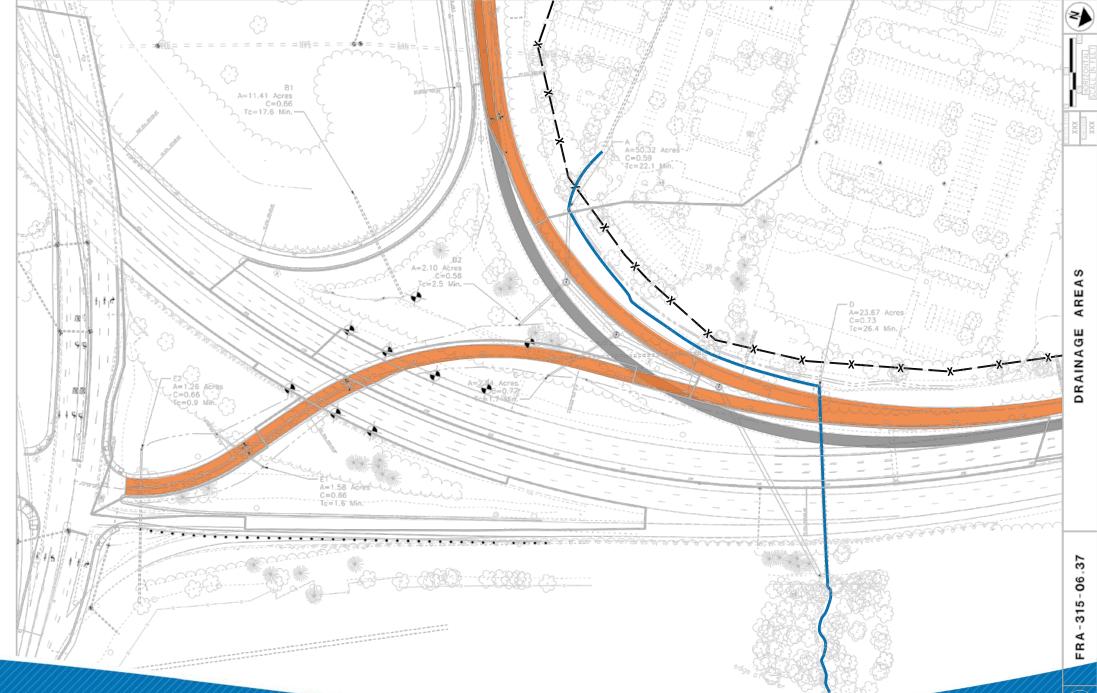
Unnamed Tributary to Olentangy River

- Drainage Area = 0.11 mi²
- Affected Length = 425 If
- HHEI = Modified Class II PHWH
- Intermittent Flow Regime
- Dense Bush Honeysuckle Corridor
- Culverted Upstream & Downstream



Proposed Impacts

- Proposed new SB exit ramp direct to N. Broadway
- Requires shifting existing SB ramp to Olentangy River Road slightly to west
- Now too close to stream!



Regulatory Constraints

Section 404 & 401 (Clean Water Act)

- U.S. Army Corps of Engineers (404)
- Ohio EPA (401)
- City of Columbus
 - Stream Corridor Protection Zone (SCPZ)
 - Type III Variance

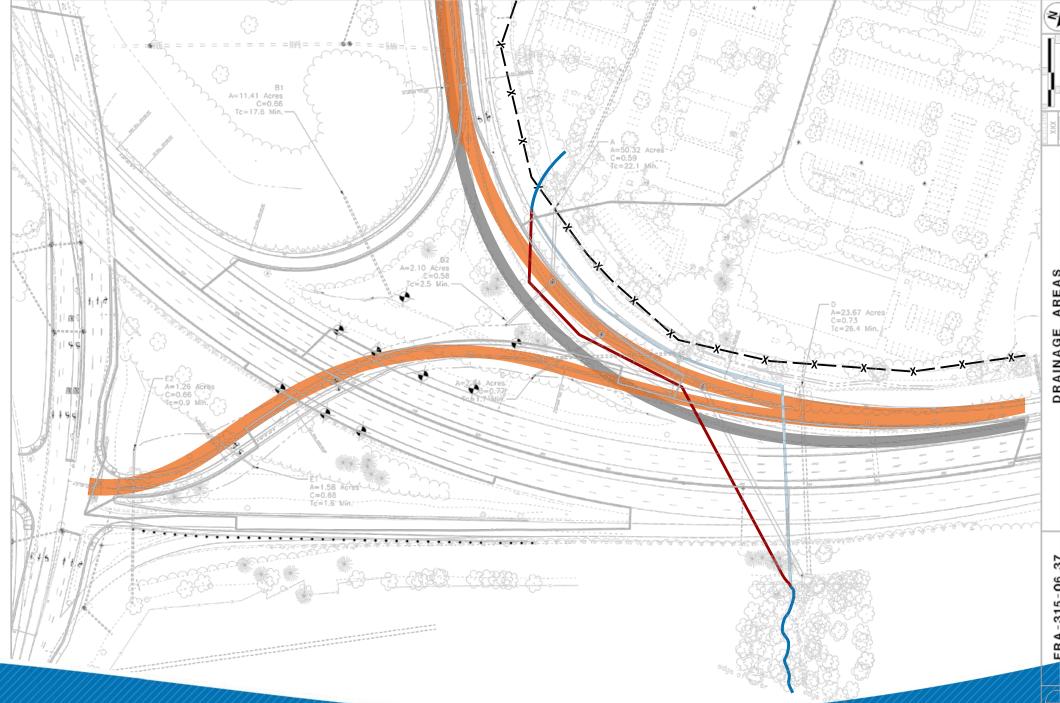
ODOT Requirements

- Roadway Geometry
- Stormwater Drainage



Alternative 1

Intercept stream flow in new culvert



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Alternative 1 – Culvert Stream

Why this won't work

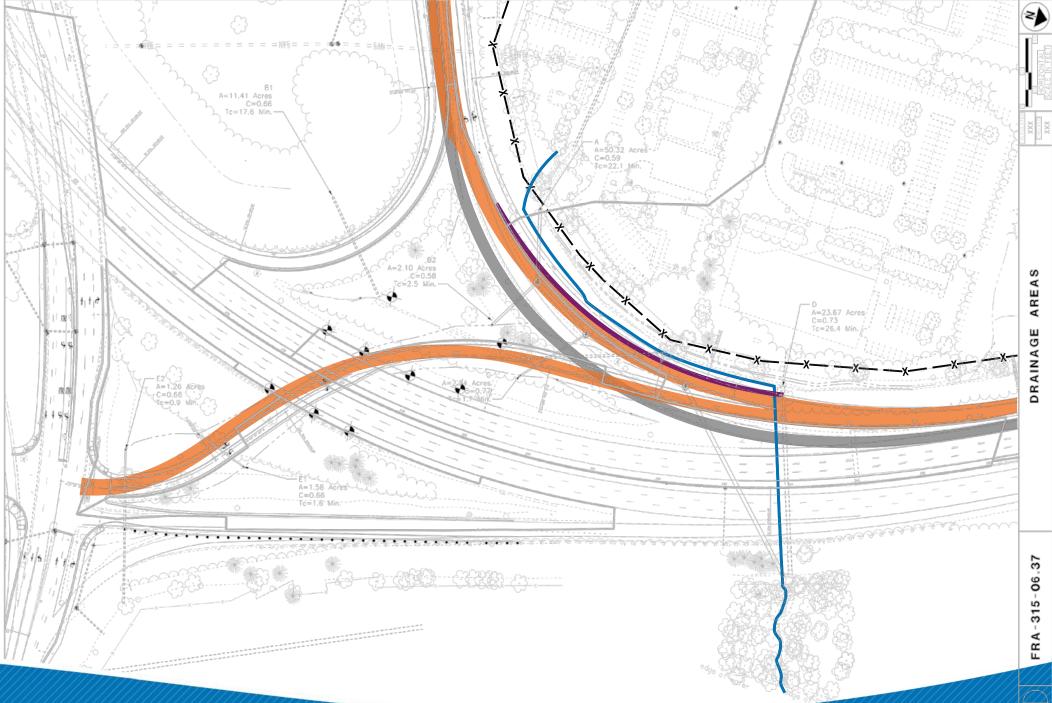
City of Columbus SCPZ requirements

- Prohibit stream channel enclosures
- Type III Variance unlikely to be granted for major stream enclosure
- Mitigation? (no fee credit opportunity)
- Section 404/401 Permitting
 - Potential risk of project being elevated to Individual Section 404/401 review
- Project Schedule



Alternative 2

 Retaining wall in lieu of standard embankment slope next to stream



Alternative 2 – Retaining Wall

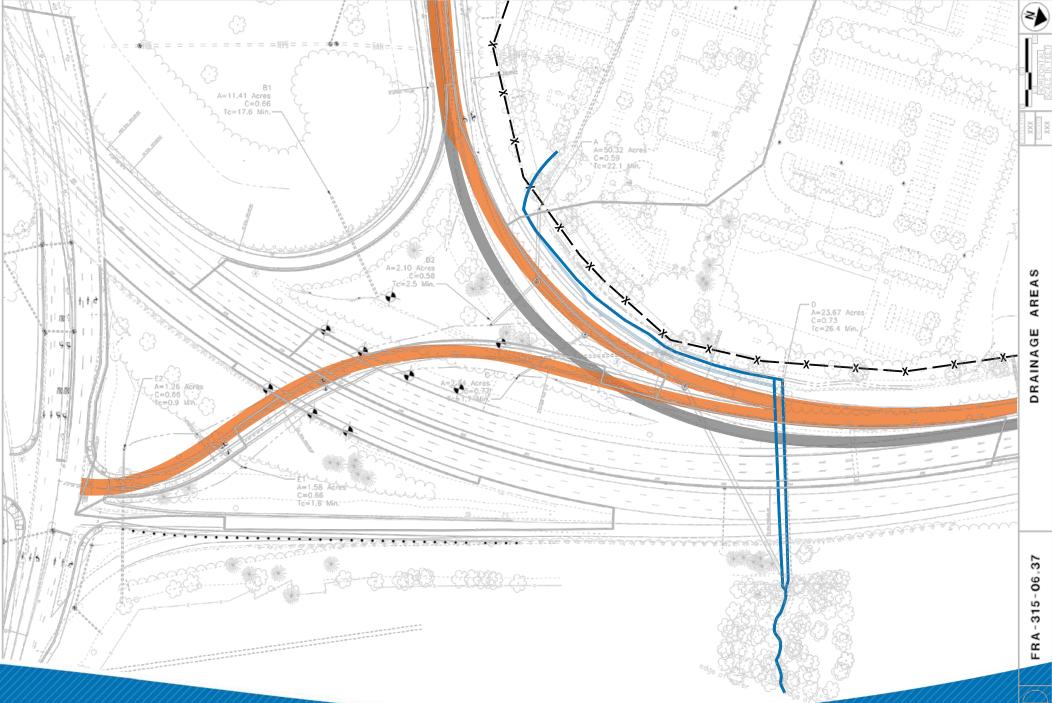
Why this won't work

- ODOT Design Standards
 - Retaining wall creates potential crash and ODOT horizontal stopping sight distance (HSSD) hazards
- Oh, and....\$\$\$\$\$\$\$



Alternative 3

- Relocate stream channel west
- Add new 60" culvert to improve storm flow routing



Alternative 3 – Relocate Stream + Additional 60 " Culvert

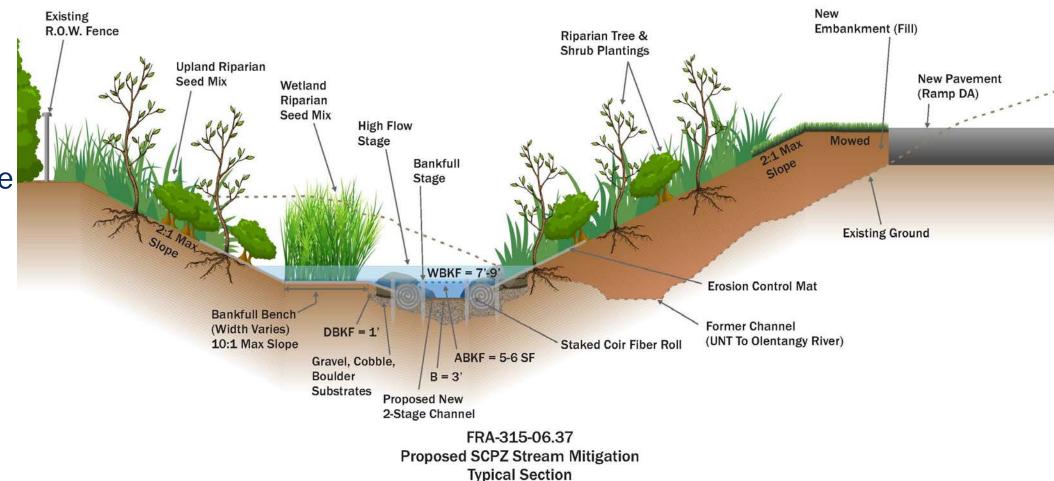
This could work!

- Maintains open channel
- Enhanced new channel provides on-site mitigation
- Eligible for Nationwide Section 404/401 permitting
- No ODOT HSSD concerns
- New 60" culvert provides ODOT compliant storm routing



Proposed Stream Mitigation Design

- 429 If
- Average 8 ft. width
- Floodplain "benches" where feasible
- Remove invasive honeysuckle
- Native tree, shrub and herbaceous riparian plantings



- Eligible for Nationwide Permit (NWP) No. 14 (Linear Transportation Projects)
- No significant resource coordination issues (endangered bat habitat, cultural resources)
- On-site mitigation (429 lf > 425 lf)
- Project schedule accommodates NWP review
- Preconstruction Notification (PCN) submitted Feb. 5, 2018

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Why this won't work

Ohio Stream Valuation Metric (OSVM)

- Released by USACE February 23, 2018
- Based on West Virginia WSWVM metric in use for some years
- Calculates stream impact "debits" and corresponding "credit" values for stream impacts and proposed stream mitigation projects
- Developed by USACE-led Ohio Interagency Review Team (IRT) responsible for approving mitigation bank and in-lieu fee program proposals in Ohio
- NOT linear foot based
- NO regulated community representation on the IRT.
- <u>NO</u> consultation with existing mitigation banks or in-lieu fee programs regarding new non-linear foot based pricing structure





- But... we submitted our application (PCN) before OSVM became effective!
- USACE determination to apply OSWM to all new and "in process" 404/401 permit applications involving stream impacts
- Looks like your project is going to be one of the first test cases!



Oh goody!

OSWM Issues:

- Can generate positive net credit for proposed stream enhancement measures, but...
 - Cannot provide site protection (in ODOT LA/ROW)
 - 20-year temporal loss (replace wooded riparian corridor)
 - 20-year monitoring period required to generate overall net positive credits
- Mitigation bank and in-lieu-fee sponsor concerns
 - IRT approval to sell new non-linear OSWM credits?
 - What are OSWM credits worth? (pricing structure concerns)
 - Prevents purchase of partial credits to address above OSVM deficiencies



Two alternatives ultimately presented by USACE:

- 1. "Cash and Carry"
 - Purchase 100% of impacts in standard linear foot-based in lieu fee credits
 - <u>NO</u> credit for proposed stream mitigation measures
 - 425 If x \$230/If = \$97,750
 - No site protection or long-term monitoring required

2. <u>"Monitor Forever"</u>

- Credit 25 years of site protection for SCPZ
- No additional credit purchase required
- Requires 20-year post-construction monitoring period
- City elects Alternative # 1



Columbus SCPZ Requirements

- Type III Variance
 - Administered by Columbus DOSD
 - Unaffected by Section 404/401 mitigation outcomes
 - <u>NO</u>credit opportunity
 - "Adequate mitigation"
 - Channel Impacts:
 - Projected stream mitigation <a>> Baseline QHEI/HHEI score
 - SCPZ Riparian Impacts :
 - 1:1 acreage replacement on-site
 - 1: 1.5 acreage replacement off-site
 - "Hardship" demonstration
 - Preferred, Minimal, No Impact Alternatives
- Submitted April 2018. Approved July 2018 !



Final SCPZ Stream Mitigation Design

- Stream relocation and earthwork to be accomplished as part of roadway project
- Stream mitigation features to be constructed under separate contract
- Channel impacts and majority of riparian SCPZ impacts to be mitigated on-site
- Remaining riparian SCPZ impacts to be mitigated off-site along Olentangy Trail



On - Site



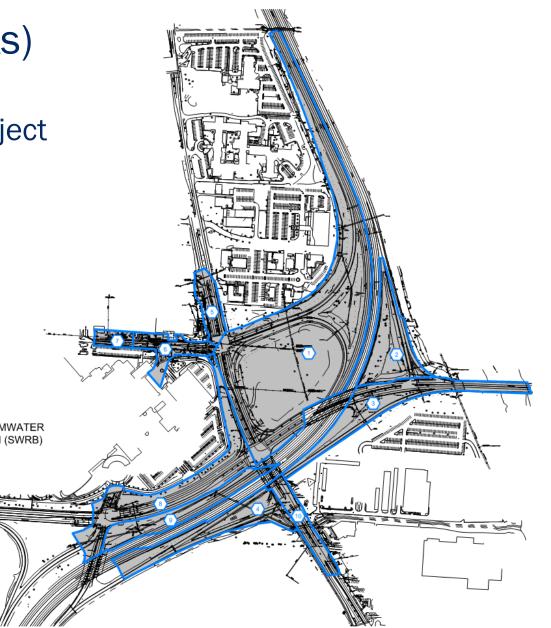


Stormwater Best Management Practices (BMPs)

Preconstruction runoff volume = 4.77 ac-ft. Postconstruction runoff volume = 4.79 ac-ft. RETENTION BASIN (SWRB) INCREASE IN RUN-OFF VOLUME < 0.5%! **BURGESS & NIPLE**

Overview of Watershed Areas (WSAs)

- 10 WSAs encompassing greater than the project extents
- Total Area = 45.21 ac.
- Impervious Area = 23.11 ac.



State v. Local BMP Requirements

Statewide General Stormwater Construction Permit

- Critical Storm Method: 1-Year Storm
- Design Response: BMPs in project area

Local City Requirements

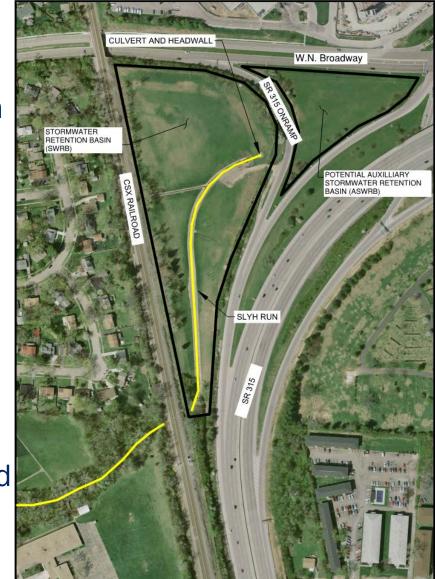
- Require peak outflow of 100-year post-construction < 10-year pre-construction !!</p>
- Design Response: Compensatory BMPs outside project area required.

ODOT Requirements

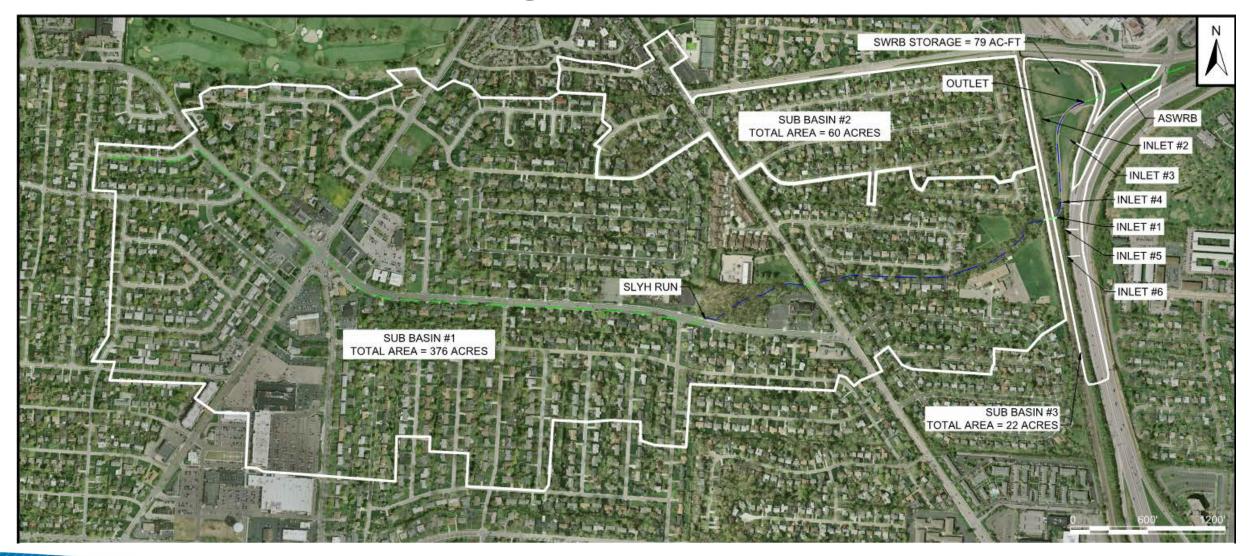
- No BMPs allowed in LA ROW (including infields)
- Design Response: Compensatory BMPs outside project area required.

Overview of Stormwater Regional Basin

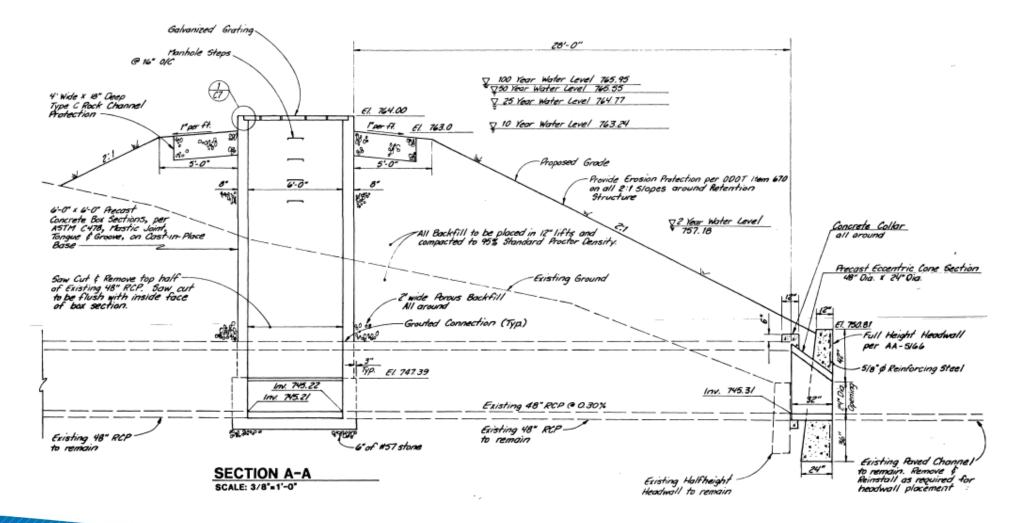
- One large and established basin (6.81 ac) with room for expansion east of the on-ramp
- Two main inlets draining approximately 450 acres
- Approximately 80 ac-ft. storage volume available
- Federal jurisdictional stream channel (Slyh Run)
 - USACE 404
 - Ohio EPA 401
 - Local Stream Corridor Protection Zone (SCPZ)
 - Schedule!
- Water <u>quality</u> and quantity control required (local and state)



Overview of Stormwater Regional Basin



Overview of Stormwater Regional Basin – Quantity Control



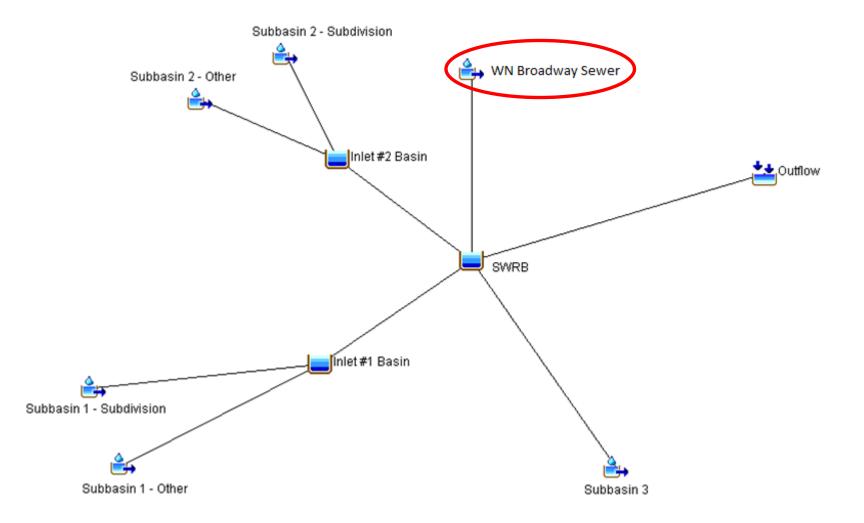
Current Condition Modeling

Restricted Inlet Model (based on mapped conditions)

- Simulates storage upstream to corroborate field observations
- Might not provide stormwater quantity control required
- Unrestricted Inlet Model (previous models)
 - Used to calibrate to existing models of the basin
 - Assumes unrestricted flow from the drainage areas to the basin

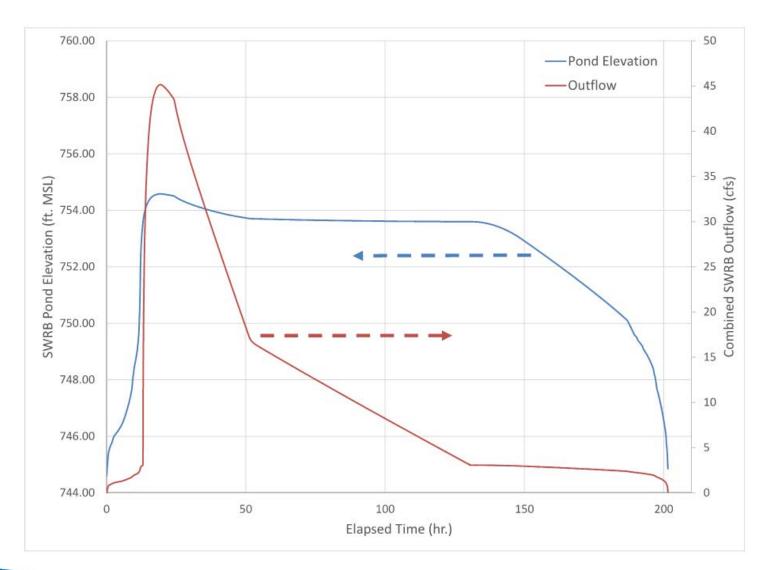


Diversion of 42" Sewer for Quantity Control – The Paradox



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Diversion of 42" Sewer for Quantity Control



Environmental Site Visit

- The utility of an environmental site visit cannot be overstated!
- Atlas maps and even as-built drawings are not always accurate
- Discrepancies in the regional basin drawings
 - Number of Inlets
 - Location of Inlets
 - Size of Inlets
 - All impact modeling!







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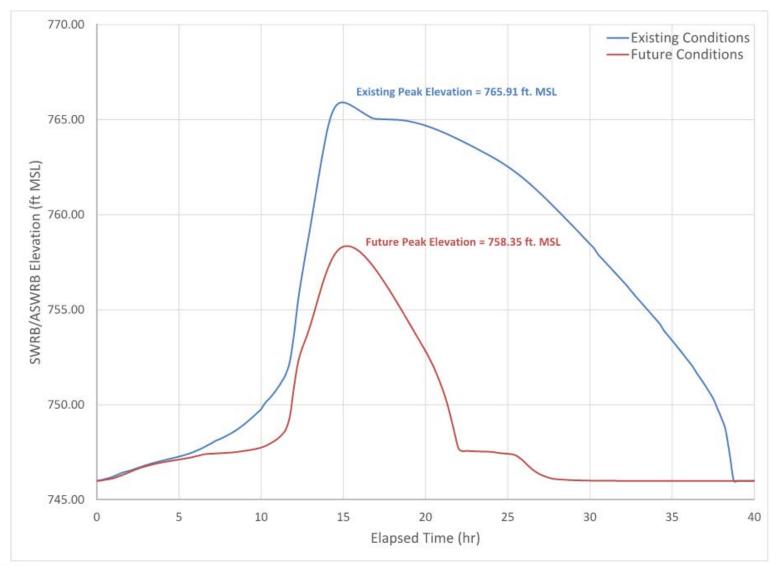
Quantity Control

- 1-year post-development storm outflows less than 1-year pre-development storm
- 100-year post-development storm outflows less than 10-year pre-development storm
- 1.5x requirement for compensatory quantity control

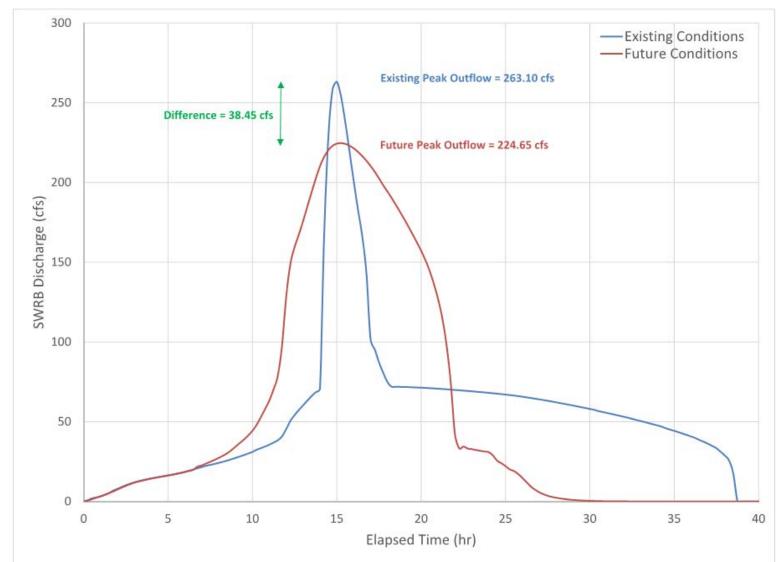
Quality Control

- Minimum drawdown time of 16-hours for 50% water quality volume of all WSAs
- Maximum drawdown time of 48-hours for 100% water quality volume of all WSAs
- 1.5x requirement for compensatory quality control





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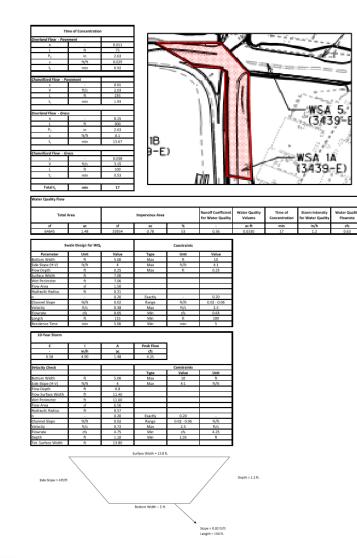


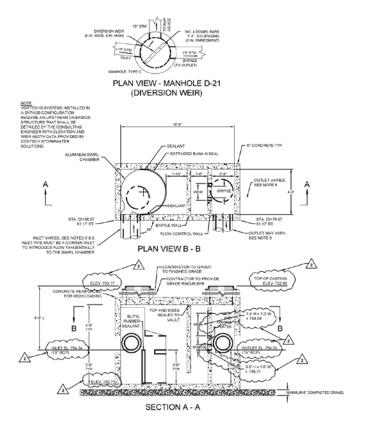
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Why This Won't Work

- Standing water near the hospital is not ideal due to water fowl and other vector attraction
- City was interested in expanding the entirety of the regional basin
- Water quality control was not possible at 1.5x as required by the pending "new" Ohio EPA General Construction Permit
- City maintenance burden

Solution: On-site Quality Control with Off-Site Quantity Control

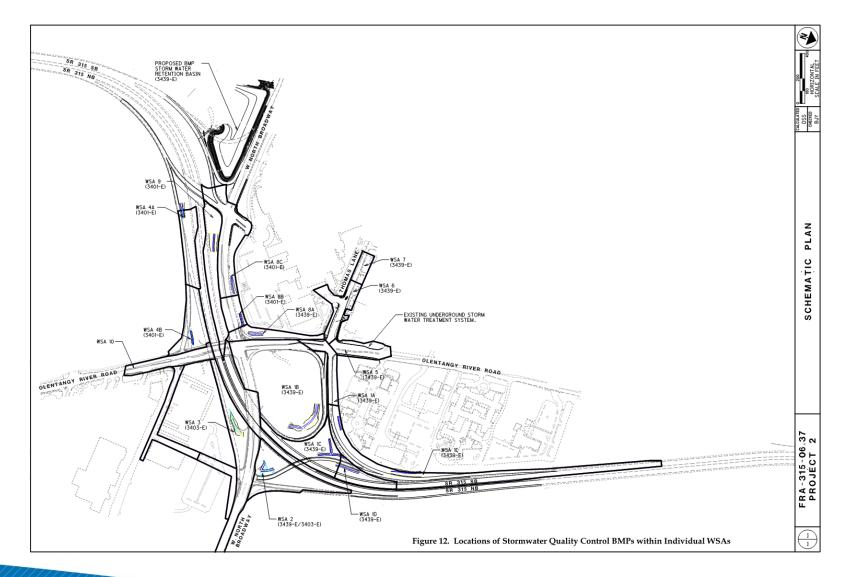




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STANDARD DETAIL STORMWATER TREATMENT SYSTEM VORTECHS® MODEL 2000

On-site Quality Control with Off-Site Quantity Control

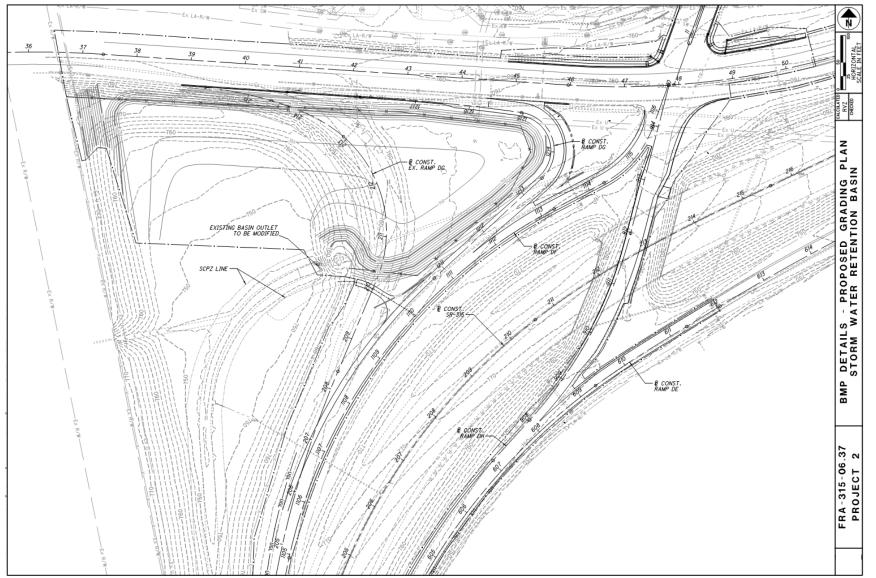


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Why this won't work

City maintenance burden. Period.

Solution: Phased Approach for Quality Control



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