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Subject:	The Mill on Flax Proposal
Date:	Wednesday, June 1, 2022 5:58:57 PM
Attachments:	image001.png

Dear City of Delaware Planning Commission Members:

The Scenic Rivers Program has had the opportunity to conduct a brief review of the proposed **The Mill on Flax** project adjacent to the Olentangy State Scenic River in the City of Delaware and would like to provide the following recommendations to minimize any potential negative impacts to the river that may result from this project. Please be advised that the following are strictly recommendations designed to protect the high quality and natural character of the Olentangy State Scenic River and reflect no regulatory authority over the proposed project.

1. A minimum of a 120 foot deep riparian forest buffer consisting of native tree species should be restored and maintained along the entire riverfront portion of the property. Riparian forest buffers are critical to the long term protection of the Olentangy River ecosystem as they provide for increased stream bank stabilization, filter pollutants and sediment from surface runoff, provide shade keeping water temperatures cool and constant, provide leaf litter to drive the aquatic food chain and contribute woody debris that provides habitat to stream life including sportfish such as the smallmouth bass.

2. Any trail systems developed on the property should be located outside of the 120 foot riparian forest buffer and should consist of gravel or other porous surfaces if located within the 100 year floodplain. If a new pedestrian trail crossing is being considered, every attempt should be made to attach the trail crossing to an existing highway bridge so as to avoid a new crossing over the Olentangy River. Bridge crossings have severe short term impacts on rivers during the construction which often includes in-stream work, removal of riparian vegetation and the destabilization of stream banks. Bridges can also have long term impacts on river systems as piers and abutments often modify stream hydrology causing accelerated bank erosion and stream bed scour downstream. Bridge piers located in river channels can also accumulate woody debris creating long term maintenance issues and potential safety hazards for river users.

3. Enhanced stormwater management facilities should be developed to treat stormwater generated by the site. Extended treatment systems to hold stormwater for longer periods of time allowing for greater pollutant assimilation and infiltration are recommended. Stormwater can also be permitted to run across vegetated areas or into infiltration trenches, bioswales or other treatment facilities designed to enhance infiltration rather than piping stormwater directly into the storm sewer system. Using porous pavers or other surfaces for parking areas and limiting the overall amount of impervious surfaces on the site can also reduce the amount of stormwater generated by the site.

The Scenic Rivers Program truly appreciates the opportunity to provide these comments and welcomes any questions that the Planning Commission, project developers or concerned citizens may have regarding the long term conservation of the Olentangy State Scenic River.

Thank you,

Bob Gable
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